UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION III**

841 Chestnut Building Philadelphia, Pennsylvania 19107

DATE: 11/29/85

3JECT: RCRA Inspection RAYMARK

PAD DO 301 5328

OM:

u:

Joseph S. Arena

Environmental Scientist (3HW11)

File

JAMES WERB ACTURE Peter W. Schaul, Ch

RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III CENTRAL REGIONAL LABORATORY 839 BESTGATE ROAD ANNAPOLIS, MARYLAND 21401

301-224-2740 FTS-922-3752

DATE

November 4, 1985

SUBJECT: RCRA Compliance Sampling Report

Raymark Industrial Division, Manheim PA (PAD003015328)

FROM

: Ronald Jones

Engineering Technician (3ES14)

TO

· Peter Schaul

≬ի¢ement Section (3HWll) Chief, RCRA Ent

THRU:

Leo J. Clark

Chief, Annapolis Field Section (3ES14)

On September 24, 1985, the EPA's Central Regional Laboratory conducted a RCRA Compliance Sampling Inspection at the Raymark Industrial Division. Manheim, Pennsylvania. Enclosed is a copy of the inspection report including all appropriate forms, checklists, analytical results, etc.

Should you have any questions regarding the enclosed report, please contact this office.

Enclosures a/s

RJ/baj

RCRA Sampling Inspection Trip Report

Raymark Industrial Division 123 E. Steigel Street Manheim, Pennsylvania (717) 665-2211

EPA ID No. PAD003015328

September 24, 1985

EPA Representatives:

Ronald Jones

Engineering Technician

Gerry Donovan

Engineering Technician

Facility Representative:

George R. Houser

Manager - Plant Engineering

On September 24, 1985, the EPA's Central Regional Laboratory conducted a RCRA Sampling Inspection at the Raymark Industrial Division (PAD003015328) as per a special request from the Regional Office. Samples were collected at two locations (1) Building 70E-Brake Lining and (2) Building 74 - Clutch Facings. This waste is wet down before disposing in the landfill, located on the facility site, because of the asbestos content in the waste. This landfill is unlined and a problem arises because of the excess water being deposited there along with the waste. The Regional Office requested that a Paint Filter Liquids Test be done on the sample, however, the solids content of the sample was too high for this test to be properly performed. Consequently, an alternate procedure had to be employed for determining liquid content.

The results of the test done at CRL indicates the amount of moisture in the sample from Building #70E to be 51.8%. The sample from Building #74 yielded a moisture content of 71.8%. The lab results are attached to this report.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III CENTRAL REGIONAL LABORATORY 839 BESTGATE ROAD ANNAPOLIS, MARYLAND 21401

301-224-2740 FTS-922-3752

DATE

: October 30, 1985

SUBJECT:

Percent Moisture Analysis of Raymark Samples

RCRA, 850925-01 - 02

FROM:

Ronald H. Altman 🗘 🗠

Chemist

то

John Austin

Acting Chief, Annapolis Laboratory

THRU

E. Ramona Trovato

Team Leader, Inorganic Analysis Section

The results of the % moisture analysis for samples 850925-01 - 02 are presented below. Originally, the Paint Filter Liquids Test was requested for these two samples, however, it was determined that the samples contained a large amount of solids making the Paint Filter Liquid Test difficult to perform. The procedure used for the % moisture is found on page 3-58 of the Procedures for Handling and Chemical Analysis of Sediment and Water Samples.

Sample Description and Results:

Lab No.	<u>Description</u>	% Moisture
850925-01 -02	Raymark Industrial Div., Sta. 1, Bldg. #70E Raymark Industrial Div., Sta. 2, Bldg. #74	51.8 + 0.4 $71.8 + 3.3$

RHA:ad

cc: P. J. Krantz QAO, CRL -/

ENVIRONMENTAL PROTECTION AGENCY Office of Enforcement

CHAIN OF CUSTODY RECORD

REGION 3 Curtis Bldg., 6th & Walnut St Philadelphia, Pennsylvania 191

PROJECT NAME PAD 003015328 PROJ. NO. RAYMARK Industrial Division NO. SAMPLERS: (Signature) OF REMARKS CON-**TAINERS** STATION LOCATION STA, NO. DATE TIME 70E 85092501 3-2/679 924/315 85092502 3-216 78 9-24 1310 Relinquished by: (Signature) Date / Time Relinquished by: (Signature) Date / Time Received by: (Signature) Received by: (Signature) 9-25-85 0754 Relinquished by: (Signature) Relinquished by: (Signature) Date / Time Received by: (Signature) Date / Time Received by: (Signature) Date / Time Relinquished by: (Signature) Received for Laboratory by: Remarks Date / Time (Signature) 9-25-8210754 Distribution: Original Accompanies Shipment; Cony to Coordinator Field Files

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

BJECT: RCRA Inspection

DATE: 10/16/85

RAYMARK IND. PAO 00 301 5328

Joseph S. Arena OM:

Environmental Scientist (3HW11)

File

cu:

Peter W. Schaul, Chief

RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

WM - 117: 2/85

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT GEN

te ID # <u>PAD 003 015 32 8</u>	License #
te Name: Raymany Indutrial Division	Phone # (7/7) 665 - 2211 ×372
ty manhim	State PA Zip Code 17545
ty	State PA Zip Code 17545 County Lancaster
esponsible Official Craig R 5mith	Title President + General Manager Title Project Engineer
erson Interviewed <u>George R Housen</u> Dennis Weller	Title Project Enginter
spector <u>Grey Harder</u>	-
	•
spection Type (Generator	Only)
Routine 11 Part B 51 Routine	
Follow Up 12 Complaint 54 Follow	•
5 Crit Stage 13 Withdrawn 56 Sample 6 Sample Only 14 Closure 60 Survey	
6 Sample Only 14 Closure 60 Survey 7 Permitting 15 Post Closure 62 Comple	
B Superfund 50 Record Rev 70 Record	•
9 Ground Water 99 Other 98 Other	Transporter
0 Survey	
	On-Site Start Time 10:00
0.0.0.	On-Site End Time
ite ID # PPD0030115328	On-Site Total Time 4:00
ue Date Inspection Date Type	Inspector ID # # Violation Enforcement
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ample # Low Sample # High	
Ionitoring Points Sampled	
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	and the second s

Enterd Cumis 7-30-85 af

1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED				
IANCE US 3 4	REQUIREMENT RADMA-4	CHAPTER CITATION 75.262		
7	Identification number	(c) (1)		
	Hazardous waste shipments offered only to licensed transporters	(¢)(4)		
1	Authorization received from TSD facility for wastes shipped off-site	(d)		
1	PA manifest used for intrastate shipments	(e)(l)(i)		
	Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(l)(iii		
	Manifests filled out properly and completely	(e)(1)		
\top	Manifests routed properly and within time limits (24 hours)	(e) (2)		
7	Proper U.S. DOT shipping containers or packages	(f)(1)(i)		
\top	Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)		
	Containers of 110 gal. or less marked with required PA label	(f)(1)(iii		
X	Placards offered to transporter	(f)(2)		
	Wastes accumulated on-site for less than 90 days	(g) (1)		
	Wastes stored in proper containers and properly marked and labeled	(g)(l)(ii		
	Containers managed in accordance with 75.265(g)	(g)(l)(ii		
	Containers clearly marked with accumulation date and visible for inspection	(g)(l)(iv		
\sqrt{X}	Records retained at designated location for 20 years	(h)		
	Quarterly reports submitted to the Department	(i)		
	Exception reporting procedures followed no exceptions reported	(j)		
X	Hazardous waste disposal plan, if required	(1)		
$ \rangle$	Spill reporting procedures followed See comments	(m) (l)		
	Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)		
X	Special requirements followed for international shipments	(0)		
		,		
		,		

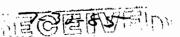
SWM-117: 2/85

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT +>D

te ID # <u>PAD 003 015 32 8</u>	License #
te Name: Raymank Industrial Division ddress 123 £ Stited St.	n Phone # (7/7) 665 - 22/1 ×372
ty manheim	State Zip Code _/ 75 45
unicipality Manheim	County Lancaster
esponsible Official Crain R Smith	Till President + General Manager
erson Interviewed Crange & Housen Otherson Weller	Title President + General Manager Title Project Engineer
Dennis Weller	
spector <u>Greg Harder</u>	
	
spection Type (Generate	or Only)
Routine 11 Part B 51 Routi	ine Hazardous 🗆 Treatment 🗆
Follow Up 12 Complaint 54 Follow	·
5 Crit Stage 13 Withdrawn 56 Samp 6 Sample Only 14 Closure 60 Surve	·
7 Permitting 15 Post Closure 62 Comp	
8 Superfund 50 Record Rev 70 Reco	
9 Ground Water 99 Other 98 Othe	r Transporter 🗆
0 Survey	
	On-Site Start Time 10:00
ite ID # PAPO 030/5328	On-Site End Time
ue Date Inspection Date Type	Inspector ID # # Violation Enforcement
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ample # Low	n (
# Company of the Comp	
Ionitoring Points Sampled	
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TREATMENT, STORAGE, PISPOSAL FACILITIES - STORAGE (Containers and Tanks)

75.265

	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED			
JANCE TUS	REQUIREMENT * RAYMANY	CHAPTER CITATION		
	Containers managed to prevent leaks and spills	(q)(1),(4		
	Containers are compatible with waste stored.	(q) (2)		
	Containers are closed during storage	(q) (3)		
X	Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)		
	Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)		
	Satisfactory procedures followed for handling incompatible wastes.	(q) (7),(8		
	Incompatible wastes separated or protected from other materials.	(q) (9)		
	Containers and tanks labeled to identify accurately hazardous waste contained. Section	Act 97 n 403(b)(
1	Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r)(2)		
\prod	Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)		
\prod	Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)		
	Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement	(r) (4)		
	Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)		
	Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.			
	Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)		
\prod	Discharge control equipment inspected once each operating day.	(r)(8)(i)		
\prod	Monitoring equipment data inspected once each operating day.	(r)(8)(ii		
\prod	Liquid level of tanks inspected once each operating day.	(r)(8)(ii		
	Construction materials of tanks inspected weekly.	(r) (8) (iv		
	Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v)		
	All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)		
//	Placement of ignitable or reactive waste only with the Department's approval	(r)(10)		
	Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(x) (1.1).		
	Precautions taken for handling ignitable, reactive or incompatible waste	(+) (12) /		

TREATMENT STORAGE, DISPOSAL FACILITIES ANDFILLS

75.265

_	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED			
JAN US		REQUIREMENT RASMA-4	CHAPTER CITATION	
2		Run-on diverted away from the facility	(v) (2)	
		Run-off collected from the active portions	(v) (3)	
_		Run-off collected from the active portions and managed as a hazardous waste		
_		if it is a hazardous waste.	(v) (3)	
		Facility is managed to prevent wind dispersal of hazardous waste.	(v) <u>(</u> 5)	
	X	The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record	(v)(6)(i)	
	X	The contents of each cell and the approximate location of each hazardous waste type within each cell kept in the operating record.	(v)(6)(ii)	
X		Closure and post-closure requirements are complied with.	(v)(7) - (10)	
X		Ignitable and reactive wastes disposed of with Department approval.	(v) (11)	
X		Precautions taken for the disposal of incompatible wastes and materials	(v) (12)	
	X	Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (13)	
	X	Written approval from the Department to dispose of hazardous wastes containing less than 20% solids content by dry weight and are flowable until November 18, 1981.	(v) (13)	
X		Hazardous waste co-disposed with municipal waste with Department approval. Empty containers crushed flat, shredded, or similarly reduced in volume	(v) (14) (v) (15)	
	H	before disposal.	(4) (13)	
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Part C - Comments

of Inspection 7-23-85 Identification Number
ny, Installation Name Rayman4
Municipality
Inspection of Landfill down accomulation arth, and related facilities conducted by SAM Israel and
and related facilities conducted by SAM Israel and
C.W. Let of EAA, Groupe House and Dennis Weller
of Rusmank, and for miller and self of DER.
Operation of the unlined huzardous waste
) landfill and its pending permit application
uns discussed.
A spill of unknown muster or material
uns found between the drum accumulation
aren and building 67. Pistrussed vegetation
and elevated H-nu readings nert
observed. The spill and associated
contaminated soil should be removed
Norteing days. Please provide a written
confirmation upon completion including
the disposal site used and an identification
of the spilled material.
inspection report is official notification that a representative of the Department of inmental Resources, Bureau of Solid Waste Management, inspected the above installation. Indings of this inspection are shown in this report. Any violations which were uncovered the inspection are indicated. Violations may also be discovered upon examination of sults of laboratory analyses and review of Department records. Notification will be soming, confirming any violations indicated herein and listing any additional violations.
Interviewed (signature) Mhilty 7-3v-85 Date
stor (elenatura) A D Marcal - Date - De 2000

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT

te ID #PAD 18 0550 545 License #
te Name: Lanchester Stabiliaed Disp Phone # (77) 354-4351
ty Hones State PA Zip Code 19344
unicipality <u>Caernarion</u> T County <u>Lancaster</u>
esponsible Official J. Enily Schaffer Title Exec Director erson Interviewed Let Steiner Title Chief Engineer
spector Grant Huder, Arthu-Dalla Pinzen
spection Type (Generator Only)
Routine 11 Part B 51 Routine Hazardous Treatment Storage Storage Disposal Disposal Disposal Disposal Disposal Disposal Disposal Treatment Storage Treatment Disposal Disposal Disposal Disposal Treatment Disposal Disposal Disposal Disposal Disposal Disposal Disposal Disposal Disposal Treatment Disposal Disp
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mment Jointlinsp WI EPA
ample # Low Sample # High Sample # High
onitoring Points Sampled

IMAZARDOUS WASTE INSPECTION REPORT Part C - Comments

of Inspection _	8-26-85	· .	Identification No	umber <u>PAP98</u>	055 059
ny, Installation	n Name				
y		Municipali	y		
A joint i	aspection con	ducted no	to EPA o	+ 65E	
LAnchester	Stabilized	Pispusal	Site. F.	resent went	<u> </u>
	Lee Steiner	- Chest	e- Co. SWA	1.	
	Donald Fost	Fauite	safe Intern	ational	
	Anna Nosc				
	George Hours				
	JUE Arena		FPA		
	Arthur L Du				·
	Gray Harde	er.	DER		
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n Interviewed (iled)	Date _	بر	
ctor (signature	\approx \sim	ules_	Date	8-27-8	s

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

SUBJECT:

Trip Report

DATE: JUL 3 1 1985

FROM:

Pennsylvania Section (3HW33)

TO:

Patrick R. Anderson, Chief Pennsylvania Section (3HW33)

Sam Israel and C.K. Lee of EPA, and Tom Miller and Greg Harder of DER-Harrisburg Regional Office conducted a joint site visit at Raymark Corporation in Manheim, Pennsylvania, on July 23, 1985. A followup meeting with Raymark personnel was held on July 24, 1985 at the DER-Harrisburg Regional Office. EPA planned this site visit to determine if, based on design, operating, and location considerations, they may join DER in denying the facilities Part B permit application. The attached report contains a summary of the site visit and followup meeting.

I. Site Visit

A. Background

The Raymark Manheim facility is a manufacturer of friction materials, primarily clutch facings, brake segments and oil well lining.

The waste generated approximately 4 million pounds annually from grooving, grinding and drilling of facings and linings, conveyed through dust work to a collector and then from the collector to screw conveyors where water (about 2:1) is mixed with the waste to control release of airborne asbestos. The resultant slurry (about 30% solid) is hauled to the landfill.

The landfill includes two parts, the inactive part is covered with a finished asphalt. The active part has three trenches, approximately 10'x50'x20' each in size. Those trenches, where the waste slurry is disposed, have neither linings nor leachate collection systems. The landfill site underlies an alluvial deposit and a carbonate bedrock. The ground water level measurements showed that the site is under water table conditions and is hydraulically connected to the underlying limestone aquifer.

A fault has been identified east of the Raymark plant and projected onto the plant approximately 500 feet south of the landfill area. The plant production wells have been located along this fault.

B. Site Visit Findings

A tour of the facility included the landfill, monitoring, wells, storage area and old landfill area. HNu readings and photographs were taken at each of the various areas. HNu readings were detected in sinkholes around the landfill, indicating that volatiles may be escaping from the landfill. A drum storage area containing a vegetation stress spot (about 1 sq. foot) near the storage area detected significantly high HNu readings. It was also noted that some cracks in the asphalt cover of the old landfill portion were developing.

C. Conclusions

- 1. The design, operation, and environmental setting of the landfill indicates the potential for waste to seep into the ground water.
- 2. A major concern is contamination of lead, asbestos and spent solvents, although analytical results have not shown any elevated lead levels thus far.
- 3. The monitoring program should include an analysis of asbestos in the ground water and surface water. If the contamination is found in the samples, an extensive investigation of the drinking water nearby the site should be performed.

4. Due to inconsistent records in ground water elevations in well #6, further hydrogeological investigation is needed to define the ground water flow pattern.

II. Followup Meeting

A. Background

DER has expressed its intentions to deny Raymark's Part B permit application, and will be issuing a public notice in the coming weeks. The denial is based on the State requirements for a double liner system at all existing landfills. Raymark's variance request for this requirement was rejected due to the fact that the facility could not show equivalent protection with no liner.

A meeting in Harrisburg on July 24, 1985, was held to discuss the previous day's site visit, and the present and future status of Raymark's Part B permit application.

B. Meeting Discussions

Initial discussions focused on the previous day's site visit. C.K. Lee expressed his concerns regarding the contaminated soil adjacent to the storage area, and the facility has agreed to dig it up. C.K. also informed the facility that they need to further investigate the hydrogeologic pattern underlying the landfill in light of discrepancies in ground water levels reported in well number 6.

Next, Dennis Weller, a Raymark representative, handed out a recomment 1) proposal to close out the landfill over the next three years while developing waste recycling, reduction, and detoxification programs. He further stated the facility's interest in entering into a Consent Agreement for extended closure with DER. The State expressed some willingness to enter into an agreement.

Sam Israel explained that if EPA followed the State and denied Raymark's Part B application, the facility may not be able to continue operating without interim status, and may have to begin closure immediately. Susan Giordano, of Raymark's corporate office, expressed concern that if the facility was forced to close the landfill at this time, the company couldn't absorb the financial burden of removing the waste offsite and would have to go out of business.

C. Conclusions

- 1. EPA may be able to follow the State and deny the permit application.
- 2. DER will likely enter into a consent agreement with the facility for extended closure.
- 3. Raymark will continue to respond to EPA's request for additional Part B information, although DER will definitely be denying its application.
- 4. If EPA denied the Part B, and the State entered into a consent agreement with Raymark for extended closure, the facility will likely be operating illegally, without interim status or a permit.

DRAFT

Raymark, Inc., Industrial Division, located at 123 E. Stiegel Street, Manheim, PA 17545, currently operates a hazardous waste landfill on-site. The landfill operates under iterim status. A complete Part B application has been accepted by and received by the Pennsylvania Department of Environmental Resources (PA DER).

PA DER will not grant a permit to operate the facility under Part B RCRA due to Part B design deficiencies and evidence of sulfate (non-hazardous) migration.

Raymark recognizes the prohibitive cost in both time and capital to either correct the design deficiencies or construct a new facility meeting RCRA Part B Design criteria. Raymark also recognizes the environmental and business value of reducing the amount of hazardous waste generated requiring subsequent disposal. Therefore, Raymark proposes to enter into a consent agreement with PA DER to close the hazardous waste disposal facility at its Manheim location by November 1988.

The hazardous waste disposed on-site is lead bearing waste generated from the production of friction products, primarily clutch facings and brake lining. The waste is generated primarily through off-grade production and design (grinding requirements). Lead, the sole hazardous constituent is not contained in all products.

In order to effectively manage down the amount of hazardous waste generated, Raymark is or will be focusing on the following fronts:

- (1) Reducing/eliminating lead as a product raw material.
- (2) Re-engineering production methods to reduce design waste.
- (3) Development of products to recycle waste as a raw material.
- (4) Determining most cost effective method to render resultant hazardous waste non-hazardous.
- (5) Evaluate feasibility of constructing a secure landfill (non-hazardous) on-site.

More detail on each of the five preceding topics follows:

I. Reducing/Eliminating lead as a raw material.

Scope: Historically, lead has been a necessary raw material for compounding friction materials.

For several years, new products developed for manufacturing at this facility have been formulated with lead substitutes. This work continues and, in fact, we have experienced an overall decrease in the amount of lead used in manufacturing.

Two obstacles exist in the current manufacturing/business environment. One is that both lead-containing and lead-free products pass through the same manufacturing equipment.

This results in a co-mingling of lead bearing and lead-free grinding waste with the resultant mixture exceeding

the hazardous waste classification. This grinding waste accounts for nearly 50 percent of the hazardous waste disposed on-site. It is cost prohibitive to construct parallel manufacturing operations to process either leadbearing or lead-free products. Likewise, our market does not allow for selective manufacturing. The second obstacle is that several lead-bearing products are sold in markets that are either reluctant to change product formulations and/or require an extremely lengthy approval period.

Gaining formulation change approvals for original equipment automotive, off-highway, and industrial applications can require at least 18 months.

Estimated time period required: 2 years minimum

II. Re-engineered production to reduce design waste

Scope: The products manufactured require dimensional conformance to rather tight tolerances, especially given the materials of construction for the products. To achieve final product specifications our products are made oversized, with subsequent machining operations effecting a product to specification. Several programs have been carried through completion to reduce the initial oversize condition of our products. Significant work in this area remains to be done. However, minimization of material used in initial product forming

will require several hundreds of thousand dollars in tooling and equipment costs.

Estimated time period required: 2 years

III. Development of products to recycle waste as a new material:

Scope: Work in this area is in the infant stage. However, some promising results have been obtained. Efforts are continuing to develop efficient processes and procedures.

Once an efficient process has been determined, efforts will begin to develop a market for these new products.

Estimated time period: 3 years

IV. Rendering Resultant hazardous waste non-hazardous:

After on-site hazardous waste disposal activity ends, the subject waste will need to be disposed in an approved facility off-site. There are no hazardous waste facilities within a reasonable distance of our plant. At current generation rates, our disposal costs could exceed \$30M per day. Our business cannot absorb this cost. It may be more effective to chemically fix any remaining waste to render it non-hazardous. This action provides the option of disposal in an approved secure landfill. Discussions and passage of information has started between Raymark and ChemFix and SolidTek Systems.

V. Constructing a non-hazardous secure landfill on-site:

In conjunction with Item IV, it may be in Raymark's best interest to construct a secure landfill on-site or on adjoining land. Investigative work on this area has not started. I have been told the approval period may be as long as 1-1/2 years for a second landfill. Design, evaluation, and construction would increase this time period.

Estimated time period: 2-1/2 - 3 years

In Raymark's opinion, an important consideration of this matter should be the fact that no statistical evidence shows a migration of a hazard constituent from the present landfill. The landfill has been in operation for well over 10 years. The purpose of the regulations is to protect the environment and the public welfare. Any abrupt closing of our facility would have a crippling effect on an already weakened business.

It is Raymark's intent to pursue each of the five areas presented. Estimated time periods are given for each area as a stand-alone project. Several of these areas will be relying on common sources of technical support. For this reason we do not expect satisfactory completion of the five-point program until 3 years from now. In the meantime, we wish to use and maintain our on-site hazardous landfill, with closure occurring prior to November 1988.

Your comments and concern on this matter are requested.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION III**

841 Chestnut Building Philadelphia, Pennsylvania 19107

JUL 2 5 1985

BJECT: RCRA Inspection RAYMARK INDUSTRIES

DATE:

IOM:

Joseph S. Arena 🥍

Environmental Scientist (3HW11)

File

Peter W.

RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT

INSPECTION REPORT

*	
Site ID # PAD 503015328	License #
Site Name: RAT MARK INDUSTRIES	Phone # (717) 665-2211 18 VT 372
Address 123 E, STIEGEL STREETS	
IN MANNEIM	State <u>PA</u> Zip Code <u>17545</u>
MunicipalityMANUEIN CITY	County LANCASTRIC
Responsible Official CRAIG RISMITH	Title PRESIDENT & GEN. MGR, END. DIV,
Person Interviewed GFOLGE (2. NOUSER	Title PROSECT ENGINEER
	0
Inspector THOMAS MILLER & ANTHUR L. DAL	LA 171422A
·	
Inspection Type (Generator	Only)
01 Routine 11 Part B 51 Routin	e Hazardous X Treatment □
04 Follow Up 12 Complaint 54 Follow	
5 Crit Stage 13 Withdrawn 56 Sample	•
6 Sample Only 14 Closure 60 Survey	
07 Permitting 15 Post Closure 62 Compl	
08 Superfund 50 Record Rev 70 Record	
99 Other 98 Other 98 Other	Transporter
10 Survey	
	On-Site Start Time 10:40 AM
0.00	On-Site End Time 11.50 AM
Site ID # 18/10/00/50/15/3/2/8	On-Site Total Time / HR IO MIN.
Due Date Inspection Date Type	Inspector ID # # Violation Enforcement
ILISTORISET INILIZIALDAT ININI	11111
062885 062685	
omment	
Sample # Low Sample # High	
Monitoring Points Sampled	
	THE TENTH OF THE STREET
	The second secon
	JUL 9 1985
	DIV. OF HAZARDOUS WALL
	WARRIED CO.

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Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management

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1.17.	Numbe	Г		

Hazardous Waste Management

Facility Inspection Checklist for Compliance with Interim
Status Standards Covering Ground-Water Monitoring
(Form 4)

ity Name	Kzymerk_	Facility Permit Number	er some 25	10
ty	Loncoster	Municipality	Manheim	
oany Address	123 18. 5tierst.	Inspector's Name	T.J. Mille	<u> </u>
	Manheim Pz. 1754	5		•
cany Contact/Official	George Houser	Branch/Organization	PEDERIG	MW
).	Manager, Planting.	Date of Inspection	6/28/8	5
of facility: (check ap	propriately)		Yes No	Unknown
 a) surface impound b) landfill c) land treatment d) disposal waste p 	facility		<u> </u>	- :
d) disposal waste p	one ·			- ,
nd-Water Monitoring P	Program			
Was the ground-water If "No",	monitoring program review	ved prior to site visit?		
a) Was the ground-site inspection?	-water program reviewed at	the facility prior to		
facility's impact on the facility has the po	nonitoring program (capable he quality of any ground-wa otential to affect, or as oth artment) been implemented	ter system which erwise deemed		
	itoring well been installed h limit of the waste managem			
representative affected by the	er samples from the upgrad of background ground-water facility (as ensured by prop ons, and depths)?	quality and not		
Listed separate from	landfill for convenience of	identification.	GEDAF	
	Page 1	of 5	JUL 91985	

, ,				
		Yes	No	Unknown
lown	at least three monitoring wells been installed hydraulically gradient at the perimeter of the waste management area? 5(n)(3)(ii)			
a)	Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the groundwater?			
o)	Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)	_/		
	the locations of the waste management areas been verified to orm with information in the ground-water program?			
a)	If the facility contains multiple waste management components, is each component adequately monitored?			
wells	ne numbers, locations, and depths of the ground-water monitoring sagree with the data in the ground-water monitoring system ram? (If "No", explain discrepancies on an attachment.)			
Well	completion details: 75.265(n)(5) and 75.265(n)(6)			
a)	Are wells properly cased?			
ь)	Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?			.
c) .	Are annular spaces properly sealed to prevent contamination of samples and the ground water?			
	a ground-water sampling and analysis plan been developed? 65(n)(7)			
a)	Has it been followed?			*
ь)	Is the plan kept at the facility?	_/		
c)	Does the plan include procedures and techniques for:			-
٠.	1) Sample collection?		e	
	_2)Sample preservation?			
	3) Sample shipment?			
	4) Analytical procedures?			
	5) Chain of custody control?		Vici	· · · · · · · · · · · · · · · · · · ·
	Page 2 of 5		19 85	

DIV OF HAZARDOUS WASTE

	, .			Yes	No	Unknown
Are t quart	he rec	quired or the	parameters in ground-water samples being tested first year? 75.265(n)(8) and 75.265(n)(9)			
a)	Are t	he gr	ound-water samples analyzed for the following:		,	•
	1)		meters characterizing the suitability of the nd-water as a drinking water supply? 75.265(n)(8)(i)			1
	2)		meters establishing ground-water quality? 65(n)(8)(ii)			
	3)		meters used as indicators of ground-water amination? 75.265(n)(8)(iii)			
		(i)	Has provision been made for the establishment of initial background concentrations of all parameters in all monitoring wells quarterly during the first year? 75.265(n)(9)		·	
		(ii)	For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 75.265(n)(10)			
ŧ		(iii)	Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(10)			· · · · · · · · · · · · · · · · · · ·
b)			ties which have completed first year ground-water and analysis requirements:			
)	1)	grou	e samples been obtained and analyzed for the und-water quality parameters at least semi-annually? 265(n)(11)(i)			* <u>· · · · · · · · · · · · · · · · · · ·</u>
j	2)	of g	re samples been obtained and analyzed for the indicators round-water contamination at least quarterly? 265(n)(11)(ii)	s		· · · · · · · · · · · · · · · · · · ·
c)			und-water surface elevations determined at each ng well each time a sample was taken? 75.265(n)(12)			
d)	annı	ually	ground-water surface elevations evaluated at least (by January 31) to determine whether the monitoring properly constructed? 75.265(n)(17)			
					0 1085	

Page 3 of 5

DIV. OF HAZARDOUS N. 83

				Yes	<u>No</u>	Unknown
e)	or de	epth of	etermined that modification of the number, location, f monitoring wells was necessary, was the system to compliance with 75.265(n)(3)? 75.265(n)(17)			
E)			oproved in writing by the Department? 75.265(n)(17)		, a	·
			f a ground-water quality assessment and abatement epared? 75.265(n)(13)			· · · · · · · · · · · · · · · · · · ·
a)	Does	s it de	scribe a program capable of the following:			
	1)		ermining which hazardous waste or hazardous waste tituents have entered the ground water? 75.265(n)(13)(i)	·		
	2)	haza	ermining the rate and extent of migration of ardous waste or hazardous waste constituents in nd water? 75.265(n)(13)(ii)			· · · · · · · · · · · · · · · · · · ·
	3)	haza	ermining concentrations of hazardous waste or ardous waste constituents in ground water?		·	
	4)		ting any ground-water contamination attributable to hazardous waste management facility? 75.265(n)(13)(iv)		: <u></u>	·
ь)	mea	surem	first year of monitoring, have at least four replicate ents of each indicator parameter been obtained for sample each well monitored? 75.265(n)(14)	les	· ·	
	1)	mea	e the results compared with the initial background ns from the upgradient well(s) determined during the year?			
		(i)	Was each well considered individually?			
ı		(ii)	Was the Student's t-test used (at the 0.01 level of significance)?	_/		
	2)		a significant increase (or pH decrease as well) nd in the:	,		
	man e e e e e e e e e e e e e e e e e e e	(i)	Upgradient wells			y management of the second
		(ii)	Downgradient wells	_/		<u> </u>
· ·			Yes", Hazardous Waste Management Form 5 must also completed.	<u> Gein</u>		
				JUL 9 191	35	

Page 4 of 5

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DIV. OF HETCHBOUS WAST

		Yes	No	Unknown
	ords been kept of the analyses required in paragraphs 75.265(n)(9) 75.265(n)(11)? 75.265(n)(18)(i)	/		·
Have rec	ords been kept of ground-water surface elevations taken at of sampling for each well (75.265(n)(12))? 75.265(n)(18)(i)			
	cords been kept of required elevations in indicator parameters (14))? 75.265(n)(18)(i)			:
	following ground-water information been reported to the ent: 75.265(n)(18)(ii)			
(a)(i)	During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?	<u>/</u>		·
(ii)	For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?	<u>/</u>		
(b)(i)	Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?			
(ii)	Have any significant differences from the initial background found in the wells been separately identified?			
(iii)	Has this information been submitted as part of the quarterly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?)	N/A	
(c)(i)	Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?			•
(ii)	Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?			·
(d)(i)	Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?			
(ii)	If applicable, has a description of the response to that evaluation been included?			
		(5 li- 1)	VI E	
	Page 5 of 5	III Q	QQA	

DIN OF BUSYBOOK 3. 12.

-SWM-88:2/83

5/28/85 te Prepared

Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management

PAO 003015328 I.D. Number

Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which

May Be Affecting Ground-Water Quality

(Form 5)

						*			
lity N	ame		Rzy	mark	Facility Permit	Number	_52m	a 23 1	0.
nty			- Lanc	rster	Municipality	*		nheim	
pany	Addres	ss :	123 E.	Stiegal St	. Inspector's Nam	ne	7.3	· will	165
				in Pr. 175					
pany	Contac	ct/Official	Georg	e Houser	Branch/Organiz	ation	PaDE	2/3	Www
e			ب	Plant Eng	Date of Inspect	ion	6/	28/85	·
e of fa	cility:	(check app	propriately)	Γ.			Yes	No	Unknown
a)		ce impound	lment	•					
с) b)	landf land	ill treatment :	facility	, ,				· 	
d)		sal waste p							
(75.) incr	26 <i>5</i> (n)(8)(iii)) for t or pH decre	he upgradie		on indicator param n a significant ckground?	ietet S			
) _. a)				on been submit 5.265(n)(18)(ii)(*		<u></u>
(75.	265(n)(8)(iii)) show	n a signific		the downgradient wor pH decrease as	ells/			
a)	dowr	ngradient w		the significant	mples taken for the difference was	ose			· .
more than a majority .	1)	Were sam	ples s plit in	two?					
* .	2)	Was the si	gnificant d	ifference due t "Yes", do not	o human (e.g., continue.				
						1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	JUL	9 1985	
				Page 1	l of 3	JU		nanchitati (m. 196	
* c	SBN (المحادلة	1, , , , , , , , ,			D[]	V. OF HAZAI	ADDOS V	A
ب		ا مر ان ود	resience	well det	ermned to	house	- su	exter	nal

				e .		
				Yes	<u>No</u>	Unknown
, d)			ermined that hazardous waste or hazardous waste ts from the facility have entered the ground water?			
	1)	requi	o", was the original indicator evaluation program, red by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), tated?		• • • •	
	٠,	a)	Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)			
e)			etermined that hazardous waste or hazardous waste ts have entered the ground water (75.265(n)(15)(vi)):			
	1)	closu	facilities where the program was implemented prior to fina ore, are determinations of hazardous waste or hazardous e constituents continued on a quarterly basis?	al		
).		grou	ne program was implemented during the post-closure period, determinations made in accordance with the nd-water quality assessment plan may cease after the determination.)			
		(a)	Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?			·
		(P)	Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?		· .	
	2)	in th	e records kept of the analyses and evaluations, specified be ground-water quality assessment (throughout the ve life of the facility)? 75.265(n)(19)(i)			
) .		(a)	If a disposal facility, were(are) records kept throughout the post-closure period as well?	·.	· .	· · ·
f)	Janu	ary 3	Il reports being submitted to the Department by 1, which contain the results of the ground-water sessment program? 75.265(n)(19)(ii)			· ·
annan in ann ann ann ann ann an	1)	of m	the reports include the calculated or measured rate nigration of hazardous waste or hazardous waste stituents in the ground water during the reporting			
		peri	od?	(G)	EU WE	
	2)	wast	the reports include the measured volumes of hazardous te or hazardous waste constituents removed from ground er using the abatement procedures specified in 265(n)(15)(vi)(C)?	JUL	9 1985	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
			Page 3 of 3	1 05 H/Z	Warrasta.	
98, tie	Lon	Z~4	formation.	4.		
1) +	المد ک	2 ste	enthe 15+ anester, 1985 report is in	* + 1 1	or. A	
= rect	عط ه	hác t	t is to be submitted which contains th	ند ب	مار عاد	withou
r = (.)4	· II bu	•	interest to a second of the	(ı	

2) Mr Dennis Weller of Payment will contact Mr.

Sem Isreel of U.S. EPA morder to schedule 2 meeting
to discuss issues perteining to Rayments LE. A lungh

NOD/NOV was sent by EPA to Rayment concerning
the facilities Part B application.

The PROFER intends to demy Reymanks Pt B applicand variance request for the landfill due to failure to provide equivalent protection for the gramewater. I seems pointless to respond to FEPA's NOO/NOU without coordination among the regulatory equicies to set priorities for Reymank.

The weeting should occur prior to the date establish FPA for response to its Notice

3) Settlement cracks in the drum recumulation struct will be reddressed by Raymanke (ALOP).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

BJECT: RCRA Inspection RAYMARK JUDUSTRILS
PAD 002015338

DATE: JUL 2 5 1985

Joseph S. Arena 🕉 🤼

Environmental Scientist (3HW11)

File

OM:

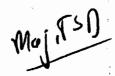
ru:

Peter W1 Schaul, Chief RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

-SWM-117: 2/85

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF SOLID WASTE MANAGEMENT



THE NO DESCRIPTION OF STATE

INSPECTION REPORT

D	
Site ID # PATO 003015 328 Site Name: RATMARK INDUSTRIES	License # Phone # (717) 665- 2211 EXT 372
Site (Valle)	Phone # (11) 665-2211 EXT 572
	StatePA Zip Code
	County LANCASTER
violincipality	Oodinty
Responsible Official CENIC R. SMITH	Title PREDIDENT + GEN, MGR, IND. DIV.
Person Interviewed Growge R. Housek	Title PROJECT BAGINEER
Inspector ARTHUE L. DALLA PLAZZA + TH	ONAS MILLER
Inspection Type (Gan	nerator Only)
	Routine Hazardous X Treatment 🗆
,	Follow Up Residual Storage
<u> </u>	Sample Municipal 🗆 Disposal 🕱
•	Survey Generator X
	Complaint Processing Surface Ann Surface A
•	Record Rev Surface App Other Transporter
	other transporter L
10 Survey	
· .	On-Site Start Time 10: 40 AM
	On-Site End Time //:50 AM
Site ID # [P A D 0 0 3 0 1 5 3 2 8	On-Site Total Time / HR 10 MINI
	•
Due Date Inspection Date Type	Inspector ID # # Violation Enforcement
이 (2 명 8 5 이 6 2 명 8 5 이 1	
401×1000 101010101	
Comment ROUTINE INSPECT	7 1 0 1 1 1 1 1 1 1 1 1
Softmone Line Line Line Line Line Line Line Li	
Sample # Low Sample #	High High
Monitoring Points Sampled	
	
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	ME@EUWBIN

		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
JAN TUS		REQUIREMENT PAD 003015 328 06-28-85	CHAPTER CITATION 75.262
		Identification number ·	(c)(l)
		Hazardous waste shipments offered only to licensed transporters	(ć) (4)
X		Authorization received from TSD facility for wastes shipped off-site	(d)
X	•	PA manifest used for intrastate shipments	(e)(l)(i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(l)(iii
Ŀ		Manifests filled out properly and completely	(e)(1)
	·	Manifests routed properly and within time limits (24 hours)	(e) (2)
$\sum_{i=1}^{n}$		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		Shipping containers marked and labeled according to U.S. DOT	(f)(l)(ii)
		Containers of 110 gal. or less marked with required PA label	(f)(l)(iii
-	X	Placards offered to transporter	(f)(2)
		Wastes accumulated on-site for less than 90 days	(g) (l)
		Wastes stored in proper containers and properly marked and labeled	(g)(l)(ii
		Containers managed in accordance with 75.265(g)	(g)(l)(ii
		Containers clearly marked with accumulation date and visible for inspection	(g) (l) (iv
1		Records retained at designated location for 20 years	(h)
		Quarterly reports submitted to the Department	(i)
\perp		Exception reporting procedures followed	(j)
×	\.	Hazardous waste disposal plan, if required	(1)
1		Spill reporting procedures followed	(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
×	·	Special requirements followed for international shipments	(0)
T			

75.265

GENERAL ACCUMILATION

_	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED							
ANCE US 3 4	REQUIREMENT PAD 003015328 06 28-85	CHAPTER CITATION						
	Containers managed to prevent leaks and spills	(q) (1), (4)						
	Containers are compatible with waste stored.	(q)(2)						
	Containers are closed during storage	(g) (g)						
	Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5) ·						
	Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.							
	Satisfactory procedures followed for handling incompatible wastes.							
	Incompatible wastes separated or protected from other materials.	(q) (9)						
7	Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 n 403(b)(2						
	Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r)(2)						
	Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)						
	Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)						
	Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement	(r)(4)						
	Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)						
-	Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.							
	Waste analyses and/or trial tests conducted on hazardous wastes substantiall different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)						
	Discharge control equipment inspected once each operating day.	(r)(8)(i)						
	Monitoring equipment data inspected once each operating day.	(r)(8)(ii)						
	Liquid level of tanks inspected once each operating day.	(r)(8)(ii						
	Construction materials of tanks inspected weekly.							
	Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.							
	All hazardous waste removed from tanks and related appurtenances at closure.							
П	Placement of ignitable or reactive waste only with the Department's approval	(r)(10)						
	Covered tanks in which ignitable or reactive waste is treated or stored meets NFDA buffer zone requirements.	(r)(11)						
	Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r)(12),()						

TREATMENT STORAGE, DISPOSAL FACILITIES - CANDFILLS 75.265

1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED								
ANCE US. 3 4	REQUIREMENT PAD 003015 328 06-28-85	CHAPTER CITATION						
	Run-on diverted away from the facility	(v) (2)						
1	Run-off collected from the active portions	(v) (3)						
	Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste.	(v) (3)						
	Facility is managed to prevent wind dispersal of hazardous waste.							
X	The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record	(v)(6)(i)						
X	The contents of each cell and the approximate location of each hazardous waste type within each cell kept in the operating record.	(v)(6)(ii)						
×	Closure and post-closure requirements are complied with.	(v)(7) - (10)						
7	Ignitable and reactive wastes disposed of with Department approval.	(v) (11)						
X	Precautions taken for the disposal of incompatible wastes and materials	(v) (12)						
X	Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (13)						
X	Written approval from the Department to dispose of hazardous wastes containing less than 20% solids content by dry weight and are flowable	(v) (13) ·						
	until November 18, 1981.							
X	Hazardous waste co-disposed with municipal waste with Department approval.	(v) (14)						
X	Empty containers crushed flat, shredded, or similarly reduced in volume before disposal.	(v) (15)						
51								
-								
П								
\prod								
\prod								

Part C - Comments

Inspection <u>G6-28-85</u>	Identification Number PAD 003015328 INDUSTRIES
, Installation Name RATMACK	
LANCUSTER	Municipality MANNEIM
ROUTINE GENERATOR, TSD	DISPOSAL INSPECTIONS TOCKTHEE WITH
A GROUND WATER MONITORING	FUALUATION, NO OFFICATIONAL
DISCREPENCIPS WERE NOTED	DURING INSPECTION.
• • • • • • • • • • • • • • • • • • • •	
	· · · · · · · · · · · · · · · · · · ·
·	
	
nmental Resources, Bureau of Solindings of this inspection are sho the inspection are indicated. V sults of laboratory analyses and	fication that a representative of the Department of d Waste Management, inspected the above installation. Own in this report. Any violations which were uncoversiolations may also be discovered upon examination of review of Department records. Notification will be indicated herein and listing any additional violation
Interviewed (signature)	A House Date 6/28/83
tor (signature) www. P.	Date 28-85

Philadelphia, Pa. 19105

SUBJECT: RCRA Inspection

DATE: 3/6/85

FROM: Accregory A. Koltonuk, Environmental Scientist

RCRA Enforcement Section (3HW11)

TO:

File

Thru:

Peter W. Schaul, Chief

RCRA Enforcement Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY

REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS

REQUIRED AT THIS TIME.

-SWM-87:2/83

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te Prepa	-	

Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management

PAD 003015328 I.D. Number

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Hazardous Waste Management

Facility Inspection Checklist for Compliance with Interim
Status Standards Covering Ground-Water Monitoring
(Form 4)

ility Name	Raymork	Facility Permit Number	er <u>300</u>	628	(<u>1.w.#</u>)
nty	Loncoster	Municipality		shein	
npany Address	123 E. Street St	Inspector's Name	ナブリ	Miller	
	Wankein Pa 17	545	George	- Herre	.در
pany Contact/Official	George Houser	Branch/Organization	PEDE	R /135	ww
	Envit. Coordinator	Date of Inspection	15/14	184	
e of facility: (check app	propriately)		Yes	<u>No</u>	<u>Unknown</u>
a) surface impound	ment				
b) landfillc) land treatment f	facility				
d) disposal waste pi					
und-Water Monitoring P	rogram				
		wad pulan ta alta wialt?			
If "No",	monitoring program review	wed prior to site visit?			
a) Was the ground-	water program reviewed a	t the facility prior to			
site inspection?		, , , , , , , , , , , , , , , , , , ,			. ———
	onitoring program (capable				
	e quality of any ground-wa tential to affect, or as oth				
	artment) been implemented				
Has at least one monit	toring well been installed h	nydraulically			
	mit of the waste managem				
	•				
	er samples from the upgrace of background ground-water				
affected by the	facility (as ensured by prop				
number, location	ns, and depths)?				
Listed separate from l	landfill for convenience of	identification.	,		

Page 1 of 5

		Yes	No	Unknown
dowr	e at least three monitoring wells been installed hydraulically agradient at the perimeter of the waste management area? 55(n)(3)(ii)	<u>/</u>		
a)	Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the groundwater?	<u>/</u>		
ь)	Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)	/		
	the locations of the waste management areas been verified to orm with information in the ground-water program?	_/		
a)	If the facility contains multiple waste management components, is each component adequately monitored?		ALM	
wells	ne numbers, locations, and depths of the ground-water monitoring agree with the data in the ground-water monitoring system am? (If "No", explain discrepancies on an attachment.)			
Well	completion details: 75.265(n)(5) and 75.265(n)(6)			
a)	Are wells properly cased?	_/		<u> </u>
b)	Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?			
c)	Are annular spaces properly sealed to prevent contamination of samples and the ground water?			
	a ground-water sampling and analysis plan been developed? 55(n)(7)	· .		
a)	Has it been followed?			
b)	Is the plan kept at the facility?			
c)	Does the plan include procedures and techniques for:			
	1) Sample collection?			
	2) Sample preservation?			
	3) Sample shipment?			
	4) Analytical procedures?			
	5) Chain of custody control?		25	

	,			Yes	No	Unknown
Are quar	the re	quired for the	d parameters in ground-water samples being tested e first year? 75.265(n)(8) and 75.265(n)(9)			
a)	Are	the gr	ound-water samples analyzed for the following:			
	1)	Para grou	meters characterizing the suitability of the nd-water as a drinking water supply? 75.265(n)(8)(i)			
	2)		meters establishing ground-water quality? 65(n)(8)(ii)			
	3)		meters used as indicators of ground-water amination? 75.265(n)(8)(iii)			•
		(i)	Has provision been made for the establishment of initial background concentrations of all parameters in all monitoring wells quarterly during the first year? 75.265(n)(9)			
		(ii)	For each indicator parameter, are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 75.265(n)(10)			
		(iii)	Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(10)	<u> </u>		
b)			ties which have completed first year ground-water and analysis requirements:			
	1)	grou	e samples been obtained and analyzed for the ind-water quality parameters at least semi-annually? 65(n)(11)(i)			
	2)	of g	e samples been obtained and analyzed for the indicators round-water contamination at least quarterly? 65(n)(11)(ii)			
c)			and-water surface elevations determined at each g well each time a sample was taken? 75.265(n)(12)			
d)	annı	ually (ground-water surface elevations evaluated at least by January 31) to determine whether the monitoring properly constructed? 75.265(n)(17)			

				Yes	No	<u>Unknown</u>
e)	or de	epth o	letermined that modification of the number, location, of monitoring wells was necessary, was the system to compliance with 75.265(n)(3)? 75.265(n)(17)		NA	
f)			ny construction modification, were any proposed pproved in writing by the Department? 75.265(n)(17)	_/		
			of a ground-water quality assessment and abatement repared? 75.265(n)(13)			
a)	Does	it de	scribe a program capable of the following:			
	1)		ermining which hazardous waste or hazardous waste stituents have entered the ground water? 75.265(n)(13)(i)			
	2)	haza	ermining the rate and extent of migration of ardous waste or hazardous waste constituents in and water? 75.265(n)(13)(ii)			· .
	3)	haza	ermining concentrations of hazardous waste or ardous waste constituents in ground water?			
	4)		ting any ground-water contamination attributable to hazardous waste management facility? 75.265(n)(13)(iv)			
ь)	meas	surem	first year of monitoring, have at least four replicate ents of each indicator parameter been obtained for sample n each well monitored? 75.265(n)(14)	es		
	1)	mea	e the results compared with the initial background ns from the upgradient well(s) determined during the year?			
		(i)	Was each well considered individually?			-
		(ii)	Was the Student's t-test used (at the 0.01 level of significance)?		,	
	`2)		a significant increase (or pH decrease as well) d in the:			•
		(i)	Upgradient wells			
		(ii)	Downgradient wells	/		·
			es", Hazardous Waste Management Form 5 must also ompleted.			٠.

			Yes	No	Unknown
		ds been kept of the analyses required in paragraphs 75.265(n)(9).265(n)(11)? 75.265(n)(18)(i)	~		
		ds been kept of ground-water surface elevations taken at sampling for each well (75.265(n)(12))? 75.265(n)(18)(i)			
	Have recor (75,265(n)(ds been kept of required elevations in indicator parameters (4))? 75.265(n)(18)(i)	_/		
		lowing ground-water information been reported to the t: 75.265(n)(18)(ii)			
	(a)(i)	During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?	_/		
)	(ii)	For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?			
	(b)(i)	Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?	<u>/</u>		
	(ii)	Have any significant differences from the initial background found in the wells been separately identified?			
	(iii)	Has this information been submitted as part of the quarterly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?		N/A_	
)	(c)(i)	Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?	/		
	(ii) •	Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?	/		
	(d)(i)	Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?		. · ·	
	(ii)	If applicable, has a description of the response to that evaluation been included?		MA	

K-SWM-88:2/83

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ate	Pi	epa	red	

Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management

PAD co3015328. I.D. Number

Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which May Be Affecting Ground-Water Quality (Form 5)

icility Name		Rays	sack	Facility Per	mit Number	300628 (I.W. #			
bunty				astier_	Municipality	у	Manheim		
ompany .	Addres	S		stregetst		Name	Cx3/		
mpany (Contac	t/Official	George	m. Pa. 1754	S Branch/Org	anization	P20E)	SWW.
је			0	corpraga	Date of Insp	pection		19/8	4
'pe of fa	cility:	(check app	ropriately)				Yes	No	<u>Unknown</u>
a) b) c) d)	landfi land t	ce impound ll reatment f sal waste pi	acility		•		<u></u>		
(75.2 incre	26 5(n)(8)(iii)) for th pH decrea	e upgradien		on indicator pa n a significant ckground?				
a)	a) If "Yes", has this information been submitted to the Department according to 75.265(n)(18)(ii)(B)?								
(75.2	Have comparisons of indicator parameters for the downgradient wells (75.265(n)(8)(iii)) shown a significant increase (or pH decrease as well) over initial background? 75.265(n)(14)(ii)								
(a)	down	gradient we		e significant o	nples taken for difference was		_/		
	1)	Were samp	les split in t	wo?				<u>/·</u>	
				ference due to Yes", do not c					

. Page 1 of 3

•		· · · · · · · · · · · · · · · · · · ·			
			Yes	No	<u>Unknown</u>
notic		ant differences were not due to error, was a written to the Department within 7 days of confirmation?			 .
grou	nd-wa	days of notification of the Department, was a certified ter quality assessment plan, based on the outline required n)(13), developed and submitted for approval? 75.265(n)(15)(i)	*\		
a)	Does	the plan specify 75.265(n)(15)(ii):			
	1)	well information (specifics)			
		(a) number?			
		(b) locations?			
	-	(c) size?			
		(d) depths?			
	2)	sampling methods?			
	3)	analytical methods?		,	
	4)	evaluation procedures?			
	5)	abatement procedures?			
	6)	schedule of implementation?	_/		
ь)	Does	the plan allow for determination of 75.265(n)(15)(iii):			
	1)	Rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water?			
	2)	Concentrations of the hazardous waste or hazardous waste constituents in the ground water?			
c)		indicated that the first determination was made as soon chnically feasible? 75.265(n)(15)(iv)			
	1)	Within 15 days after the first determination, was a written report containing the assessment of ground-water quality submitted to the Department?		<u>/*</u> z	
Dis	eussio mific	ns with the corporation had resulted in notification and differences existed and therefore the Grandw	by the	· DEZ +	ihet en t

Page 2 of 3

* ,

#2 First determination was made prior to completion of 1st guarter after the initial year of monitoring. Land Brown

. *				Yes	No	Unknown					
d)			ermined that hazardous waste or hazardous waste ts from the facility have entered the ground water?								
	1)	requi	o", was the original indicator evaluation program, red by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), tated?	<u></u>	ALK						
		a)	Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)		AIH						
e)			etermined that hazardous waste or hazardous waste ts have entered the ground water (75.265(n)(15)(vi)):								
	1)	closu	facilities where the program was implemented prior to find re, are determinations of hazardous waste or hazardous e constituents continued on a quarterly basis?	nal							
		care groun	ne program was implemented during the post-closure period, determinations made in accordance with the nd-water quality assessment plan may cease after the determination.)			•					
		(a)	Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?								
		(p)	Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?			*					
	2)	in the	e records kept of the analyses and evaluations, specified e ground-water quality assessment (throughout the ve life of the facility)? 75.265(n)(19)(i)	<u> </u>							
		(a)	If a disposal facility, were(are) records kept throughout the post-closure period as well?		AIM.						
f)	Janu	ary 31	reports being submitted to the Department by , which contain the results of the ground-water essment program? 75.265(n)(19)(ii)								
	1)	of m	he reports include the calculated or measured rate igration of hazardous waste or hazardous waste tituents in the ground water during the reporting od?			-					
	2)	waste wate	he reports include the measured volumes of hazardous e or hazardous waste constituents removed from ground or using the abatement procedures specified in (55(n)(15)(vi)(C)?		✓	,					

ANALYTICAL DATA MONITORING WELLS RAYMARK INDUSTRIES, INC. - MANHEIM, PENNSYLVANIA YEAR: FOUR

QUARTER: ONE

SAMPLE DATE: MARCH 19, 1985

Parameter .	BCM Sample No. Units	Well No. 3 N505389	Well No. 4 N505390	Well No. 6 N505391	Well No. 7 N505392	Well No. 9 N505393	Well No. 10A N505394	Well No. 10B N505395
Water Table Elevation *		380.64	378.80	385.80	380.81	382.40	381.35	380.94
INDICATOR PARAMETERS								
рН	Standard Units	8.1	7.4	7.0	7.6	7.6	7.0	7.6
Specific Conductance	umhos/cm	3,150	1,860	1,970	1,060	467	2,050	2,520
Total Organic Carbon	mg/l	39	12	15	23	20	27	39
Total Organic Halides	ug/l	25.6	23.4	<20.0	<20.0	<20.0	<20.0	<20.0
QUALITY PARAMETERS								
Chloride	mg/l	42.0	23.7	5.5	18.6	12.1	7.6	15.6
Sodium	mg/l	160.0	94.3	5.20	35.6	5.20	24.7	78.0
Sulfate	mg/l	781.0	453.0	817.0	124.0	28.0	377.0	371.1
ADDITIONAL PARAMETERS								
Total Dissolved Solids	mg/l	2,420	1,490	1,740	648	257	1,560	1,730
Alkalinity as CaCO ₃ : Methyl Orange Phenolphthalein Bicarbonate Hydroxide Carbonate Free Carbon Dioxide	mg/l mg/l mg/l mg/l mg/l mg/l	2,300.0 <1 2,273.0 <1 26.9 36.1	1,086.0 <1 1,083.4 <1 2.6 54.4	300.0 <1 299.7 <1 0.28 59.9	438.0 <1 436.3 <1 1.63 218.2	470.0 <1 469.5 <1 1.76 23.59	630.0 <1 629.40 <1 0.59 125.88	1,242.0 <1 1,237.35 <1 4.6 618.7
Lead	mg/l	<0.002	<0.002	<0.002	0.002	0.007	0.003	0.013
Nitrogen, Ammonia	mg/l	1.44	<0.05	<0.05	<0.05	0.05	0.45	0.62
Nitrite as N	mg/l	0.01	<0.01	<0.01	<0.01	<0.10	<0.20	<0.20
Nitrate as N	mg/l	0.22	3.99	1.35	16.9	1.98	<2.0	<2.0
Phosphate	mg/l	0.08	<0.05	<0.05	<0.05	<0.05	0.13	<0.05
Potassium	mg/l.	15.0	2.16	13.7	2.70	1.59	8.75	9.17
Calcium	mg/l	129	240	227	111	64.6	168	156
Magnesium	mg/l	313	81.5	174	30.8	. 12.7	168 .	269

Water Table Elevation Well No. 8 (3/19/85) - 380.83 feet
* Groundwater levels in feet above mean sea

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts. Philadelphia, Pa. 19106

DATE: 2/5/85

SUBJECT: RCRA Inspection - Raymark InQuesties Manheim, Pa.
PAD 003015328

FROM: 9K-Gregory A. Koltonuk, Environmental Scientist RCRA Enforcement Section (3HW11)

TO:

File

Thru:

rcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS

INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE

VIOLATIONS.

MyntsD

HAZARDOUS WASTE INSPECTION REPORT Generators - Part A



	•
ate of inspection 12-14-84 Time start 11:00 Time fini	sh /2:00
ame of inspector Grey Haylor Jon Miller	
ompany, installation name RASIMALY Industries	
ocation 123 E Stiegel St.	
ounty Lineaster Municipality Markeim	,
lentification number PAID 003 015 328	•
ame of responsible official Crain & Smith	
tle President and General Manager Ind. Die	/
tle President and General Manager Ind. Die miling address 100 Oakville Prive Trumball CT	06611
rea code and phone no. 203 - 37/-010/	
ame of person interviewed Ground R House	
itle Project Engineer	
ailing address (if different from above) 123 E Stiegel St. 1	nanheim P4
rea code and phone no. 7/7-665-2211	175-45
Current waste handling method:	
) a. 💢 On-site 🖂 treatment, 🛣 storage, 💢 disposal	
b. 💢 On-site 🗀 use, 🗀 reuse, 🗀 recycle, 💢 reclaim	
c. 📈 Off-site 🖊 treatment, 🖊 storage, 📈 disposal	
d. Ø Off-site 🖊 use, Ø reuse, 🖊 recycle, 🖊 reclaim	
Amount of hazardous waste produced:	
a. 180,000 16/quete kg. Ano. solvents (third Q 182)	34
bkg./yr.	
Types of hazardous waste produced by Hazardous Waste Number:	
PUUI FUU3/FUU5 DOUS	

Are hazardous wastes transported off-site by the generator? Yes X No

<u> </u>		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
TUS 3		REQUIREMENT	CHAPTER CITATION 75.262
		Identification number	(c)(1)
		Hazardous waste shipments offered only to licensed transporters	(¢)(4)
X		Authorization received from TSD facility for wastes shipped off-site /	(d)
X		PA manifest used for intrastate shipments	(e)(l)(i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(l)(iii
		Manifests filled out properly and completely	(e)(l)
		Manifests routed properly and within time limits (24 hours)	
1		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
		Containers of 110 gal. or less marked with required PA label	(f)(l)(iii
	X	Placards offered to transporter	(f)(2)
		Wastes accumulated on-site for less than 90 days	(g)(l)
		Wastes_stored_in_proper_containers_and_properly_marked_and_labeled	(g)(l)(ii
		Containers managed in accordance with 75.265(g)	(g)(l)(ii
		Containers clearly marked with accumulation date and visible for inspection	(g)(l)(iv
)	X	Records retained at designated location for 20 years	(h)
		Quarterly reports submitted to the Department	(i)
		Exception reporting procedures followed no exceptions reported	(j)
X		Hazardous waste disposal plan, if required	(1)
		Spill reporting procedures followed nospils reported	(m) (1)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
X		Special requirements followed for international shipments	(0)
		DEC 2 1 1004	
			• .
T			
1	П		

TSD Facilities - Part A

ate of inspection 12-11-84 Time start 10:00 Time finish 11:00
ame of inspector Grey Hunder Tom Miller
ompany, installation name Rusmanh Industries
ocation 123 E Stityt St.
ounty Lancaste Municipality Markein
dentification number PAD003 015 328
me of responsible official Craig R Smith
tle President and General Manage, J.A. Div.
ailing address 100 Cakville Drive Trumball CT C6611
Tea code and phone no. 203 - 37/ - 0/0/
ame of person interviewed George R Houser
tle Project France
ailing address (if different from above) 123 £ Stieged St. Manheim PA
rea code and phone no. 7/7-665-22// 17545
Site characterization:
a
b. Storage - Containers, Conta
c. Disposal - I land treatment, Alandfill, I incineration, I thermal treat-
ment d. Use, reuse, recycle, reclaim
Does the facility generate hazardous wastes? 💢 Yes 🖊 No
Types of hazardous waste produced by Hazardous Waste Number:
DU01 F005 D008 F003
F003
Are hazardous wastes transported off-site by the facility? Yes No

HAZARDOUS WASTE INSPECTION REPORT Part C - Comments

of Inspection 12-19-84 Identification Number PAD 00 3015328
ny, Installation Name Rayma-4
:yMunicipality
The mixed solvent wastestran (naptha hoptime
and tolure and MEW was manifested variously as
FOUT/FOUS; FOUS; and FOUS/FOUS and.
was reported or quarterly reports as avoi / FUUS;
- DUOI / FUOI / FUOS; AND DUVI / FOUS / FUUS.
The Fool designation is incorrect and should
not be used on manifest or quarterly report
since chlorinated hydrocarbons are not.
contained in trest muster straums.
Man. fest & PAB 001/4903 was man. tested
to a Solvents Recovery Service in Southington
Connecticut with a listed ID number
of NJ DOUZ 182897. This discrepency
Nas resolved by intacting facility. ID number
Should be CTD 00 971 7604-
Submission of a closure plan for 6502/1984
drum storage area which is now becoming
nspection report is official notification that a representative of the Department of
nmental Resources, Bureau of Solid Waste Management, inspected the above installation. ndings of this inspection are shown in this report. Any violations which were uncovered the inspection are indicated. Violations may also be discovered upon examination of
sults of laboratory analyses and feview of Department records. Notification will be soming, confirming any violations indicated herein and listing any additional violations.
Interviewed (signature) Il bullow Date 12/19/84
tor (signature) 22 Admin Date 12-11-84

SWM-87: 9/83	COMMONWEALTH OF PE	ENNSYLVANIA	PAIXIO	115328
Prepared	DEPARTMENT OF ENVIRONME BUREAU OF SOLID WASTE	ENTAL RESOURCES	I.D. Number	
	Hazardous Waste I	Vlanagement		
	cility Inspection Checklist Status Standards Covering FORM 4			
ility Name	Raymark Industries	Facility Permit Number	IW	3 00628 16im
ınty	Lancaster	Municipality		
mpany Address	Manheim PA 17545	Inspector's Name		rder/TIm. Il
mpany Contact/Official		Branch/Organization	BSIVI	n /Pi DER 1-84
е	Project Engineer	Date of Inspection	6-1	1-84
pe of facility: (check ap	propriately)	Yes	No	Unknown
a) surface impourb) landfill	11 1 1	X		
c) land treatment	11 ()	1984		
d) disposal waste	ny OF HEZAK	DOUR Server		-
Was the ground-wat	ter monitoring program reviewed	d prior to site visit?	· · · · · · · · · · · · · · · · · · ·	
a) Was the groun site inspection	d-water program reviewed at t ?	he facility prior to	 	
facility's impact on t facility has the pote	monitoring program (capable of the quality of any ground-water ntial to affect, or as otherwise of been implemented? 75.265()	system which the deemed necessary	· · ·	· · · · · · · · · · · · · · · · · · ·
	onitoring well been installed hy of the waste management are			·
tative of backg	ater samples from the upgradic ground ground-water quality ar ensured by proper well numb	nd not affected by		5
Listed separate from	m landfill for convenience of i	dentification.	-	

		Ves	No	Unknown
dov	re at least three monitoring wells been installed hydraulically ungradient at the perimeter of the waste management area 265(n)(3)(ii)	× <u>X</u>		
a)	Do well number, locations, and depths ensure prompt detection of any statistically significant amounts of hazardous waste of hazardous waste constituents that migrate from the waste management area to the groundwater?	r .		
b)	Have the locations of the monitoring wells been approved by the Department? 75.265(n)(3)(iii)	e <u>X</u>		
	re the locations of the waste management areas been verified to form with information in the ground-water program?	° <u>X</u>		· · · · · · · · · · · · · · · · · · ·
a)	If the facility contains multiple waste management components is each component adequately monitored?	s, <u>X</u>		
ing	the numbers, locations, and depths of the ground-water monitor wells agree with the data in the ground-water monitoring system gram? (If "No", explain discrepancies on an attachment	n 🔏		
We	Il completion details: 75.265(n)(5) and 75.265(n)(6)			
a)	Are wells properly cased?	<u>X</u>	· · · · · · · · · · · · · · · · · · ·	
b)	Are wells screened (perforated) and packed where necessary tenable sampling at appropriate depths?	<u> </u>		. —
c)	Are annular spaces properly sealed to prevent contamination of samples and the ground water?	of <u>X</u>	· .	
	s a ground-water sampling and analysis plan been developed 265(n)(7)	⁷ <u>X</u>		
a)	Has it been followed?	<u>X</u>		`
b)	Is the plan kept at the facility?	X		
c)	Does the plan include procedures and techniques for:			
	1) Sample collection?	X		
	2) Sample preservation?	<u>X</u>		
	3) Sample shipment?			
	4) Analytical procedures?	K		
	5) Chain of custody control?	X		

3				Ves	No	Unknown
Are qua	the rterly	requi	red parameters in ground-water samples being teste the first year? 75.265(n)(8) and 75.265(n)(9)	ed X		
a)	Are	the s	ground-water samples analyzed for the following:		1	•
	1)	Para as a	meters characterizing the suitability of the ground-wat drinking water supply? 75.265(n)(8)(i)	er X		
	2)		ameters establishing ground-water quality 265(n)(8)(ii)	<u> </u>		
	3)		meters used as indicators of ground-water contamin 7 75.265(n)(8)(iii)	a- <u>X</u>		
		(i)	Has provision been made for the establishment of i itial background concentrations of all parameters in monitoring wells quarterly during the first year 75.265(n)(9)	all ,		
		'(ii)	For each indicator parameter, are at least four replica measurements obtained at each upgradient well feach sample obtained during the first year of monitoring? 75.265(n)(10)	or		
		(iii)	Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 75.265(n)(1)	ve he X	. ———	
b)			ties which have completed first year ground-water sam analysis requirements:	pįl-		
	1)	wa	re samples been obtained and analyzed for the groun ter quality parameters at least semi-annually 265(n)(11)(i)			
	2)	of	ve samples been obtained and analyzed for the indicate ground-water contamination at least quarterly 265(n)(11)(ii)	ors y? <u>X</u>		
c)			round-water surface elevations determined at eang well each time a sample was taken? 75.265(n)(1		-	
d)	nua	illy (b	e ground-water surface elevations evaluated at least a y January 31) to determine whether the monitoring we erly constructed? 75.265(n)(17)	N .		
e)	or o	depth	determined that modification of the number, location of monitoring wells was necessary, was the system into compliance with 75.265(n)(3)? 75.265(n)(17)	em X		
f)			any construction modification, were any propos			

٠,							
					Yes	No	Unknown
				of a ground-water quality assessment and abatement prepared? 75.265(n)(13)	<u>X</u>		·
a))	Doe	s it d	lescribe a program capable of the following:	•		
		1)	con	ermining which hazardous waste or hazardous waste stituents have entered the ground water? 265(n)(13)(i)	<u>X</u>		
		2)	was	ermining the rate and extent of migration of hazardous te or hazardous waste constituents in ground water? 265(n)(13)(ii)	<u>X</u>		
		3)		ermining concentrations of hazardous waste or hazars waste constituents in ground water? 75.265(n)(13)(iii)			
		4)		ting any ground-water contamination attributable to the ardous waste management facility? 75.265(n)(13)(iv)			<u> </u>
b)		mea	sure	e first year of monitoring, have at least four replicate ments of each indicator parameter been obtained for taken from each well monitored? 75.265(n)(14)	<u>X</u>	-	-
		1)		re the results compared with the initial background means in the upgradient well(s) determined during the first year?	<u>X</u>		
			(i)	Was each well considered individually?	<u> </u>		-
			(ii)	Was the Student's t-test used at the appropriate level of significance (see Chapter 75, Subchapter D, Appendix III)?			
		2)	Was in th	s a significant increase (or pH decrease as well) found ne:	, .		
			(i)	Upgradient wells	<u>X</u>		
	•		(ii)	Downgradient wells	<u>X</u>		
				If "Yes", Hazardous Waste Management Form 5 must also be completed.			
				s been kept of the analyses required in paragraphs through 75.265(n)(11)? 75.265(n)(18)(i)	X	•	· .
				been kept of ground-water surface elevations taken at mpling for each well (75.265(n)(12))? 75.265(n)(18)(i)	<u>X</u>		
				been kept of required elevations in indicator parameters 4))? 75.265(n)(18)(i)	<u>X</u>		

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description of the second description of the second of the

	of an italian multi-sala and an italian an italian and an italian an italian and an italian an i	A SECURE AND DESCRIPTION OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF TH) Yes	No	Unknown
4.		e following ground-water information been reported to the ment: 75.265(n)(18)(ii)	·		٠.
	(a)(i).	During the first year, initial background concentrations of parameters listed in 75.265(n)(8)(i) within 15 days after completing each quarterly analysis required during the first year?	•		<u></u>
	(ii)	For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplies been separately identified?			
	(b)(i)	Semi-annual measurements of the parameters establishing ground-water quality (75.265(n)(8)(ii)) for each ground-water monitoring well taken at the end of the first (April 1) and third (October 1) quarters?	١.		
).	(ji)	Have any significant differences from the initial background found in the wells been separately identified?	<u>\lambda</u>		
	(iii)	Has this information been submitted as part of the quarter- ly report (75.265(m)) for those facilities receiving hazardous waste from off-site sources?			•
	(c)(i)	Quarterly measurement of the parameters used as indicators of ground-water contamination (75.265(n)(8)(iii)) and the required evaluations of these parameters under 75.265(n)(14)?			
	(ii)	Have any significant differences from initial background found in the upgradient wells been separately identified and included in the quarterly submission?			
)	(d)(i)	Quarterly results of the evaluation of ground-water surface elevations under 75.265(n)(17)?	<u>×</u>		·
	(ii)	If applicable, has a description of the response to that evalua-	· v		

tion been included?

-SWM-88:2/83

6-21-84 te Prepared

Commonwealth of Pennsylvania Department of Environmental Resources Bureau of Solid Waste Management

PAD 003015-328

Hazardous Waste Management

Inspection Compliance Checklist for a Facility Which May Be Affecting Ground-Water Quality (Form 5)

il	ity Na	ame		Raymar	k Industri	S Facili	ity Permit Numb	oer <u>IW</u>	3006:	<u>.</u>
un	ty			Lancas	ter	Munic	cipality	man	heim	
m	pan <u>y</u> A	Address	}	123 E Stiegel St Inspecto			ctor's Name	G-L Ha.	de- 1 T-	I miller
ار ie	,	Contact	t/Official	Manheim George Project	PA 17545 Houser Engineer	Branc	ch/Organization of Inspection		m/Pa 19-84	DER
)e	of fa	cility:	(check app	ropriately)	الله من الله الله الله الله الله الله الله الل	TTTT		Yes	No	Unknown
	a) b) c) d)	landfi land t dispos	reatment f al waste pi	acility lle	M//	JUL 2	1984	<u>×</u>		
	incre	א)(ח)(צ)(iii)) for th pH decrea	ie upgradieni	contamination to the contamina	n a signi	ator parameters licant	<u>X</u>		
)	a)				n been submit 265(n)(18)(ii)(l		ne	X		
	(75.2	65(n)(8)(iii)) showi	ndicator para n a significar ground? 75.2	nt increase (or	ne down PH dec	gradient wells crease as	X		
	a)	downg	radient we		e significant d		ken for those ce was	<u>X</u> ,		
		1)	Were samp	les split in t	wo?			p -00-00-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0	X	•
	,	2)	Was the sig laboratory)	nificant diff error? If "	erence due to Yes", do not c	human ontinue	(e.g.,		<u>X</u>	

			Yes	<u>No</u>	<u>Unknown</u>
notio		ant differences were not due to error, was a written t to the Department within 7 days of confirmation?	_X_		·
grou	nd-wa	days of notification of the Department, was a certified ter quality assessment plan, based on the outline required n)(13), developed and submitted for approval? 75.265(n)(15)(i)	X		-
a)	Doe	s the plan specify 75.265(n)(15)(ii):			•
	1)	well information (specifics)	<u>X</u>		
		(a) number?	X		
		(b) locations?	<u>X</u>		•
		(c) size?	X		
		(d) depths?	X		
	2)	sampling methods?	X		-
	3)	analytical methods?	X		-
	4)	evaluation procedures?	<u> </u>		
	5)	abatement procedures?			
	6)	schedule of implementation?	<u> </u>		
b)	Doe	s the plan allow for determination of 75.265(n)(15)(iii):	`,		,
	1)	Rate and extent of migration of hazardous waste or hazardous waste constituents in the ground water?	<u> </u>		<u> </u>
	2)	Concentrations of the hazardous waste or hazardous waste constituents in the ground water?	<u> </u>		-
c)	Is it	indicated that the first determination was made as soon echnically feasible? 75.265(n)(15)(iv)	<u>X</u>		· .
-	1)	Within 15 days after the first determination, was a written report containing the assessment of ground-water quality submitted to the Department?			**
,				. \	

•				Yes	No	Unknown
d)	Was cons	it det tituer	ermined that hazardous waste or hazardous waste its from the facility have entered the ground water?	X		
	1)	requ	No", was the original indicator evaluation program, aired by 75.265(n)(7) - 75.265(n)(12) and 75.265(n)(14), stated?			
- ·		a)	Was the Department notified of the reinstatement of program within 15 days of the determination? 75.265(n)(15)(v)			
e)	If it	was c	determined that hazardous waste or hazardous waste nts have entered the ground water (75.265(n)(15)(vi)):			
	1)	clos	facilities where the program was implemented prior to fin ure, are determinations of hazardous waste or hazardous te constituents continued on a quarterly basis?	al		
		care grou	he program was implemented during the post-closure e period, determinations made in accordance with the und-water quality assessment plan may cease after the t determination.)			
		(a)	Were subsequent ground-water quality reports submitted to the Department within 15 days of determination?	<u>×</u>		
		(b)	Has an approvable abatement plan, to be used to abate the ground-water contamination, been developed and submitted to the Department?		· _X	
	2)	in t	re records kept of the analyses and evaluations, specified the ground-water quality assessment (throughout the ve life of the facility)? 75.265(n)(19)(i)	×		
		(a)	If a disposal facility, were(are) records kept throughout the post-closure period as well?	FYM		
f)	Jan	uary 3	al reports being submitted to the Department by 1, which contain the results of the ground-water seessment program? 75.265(n)(19)(ii)	<u>X</u>		
	1)	of n	the reports include the calculated or measured rate nigration of hazardous waste or hazardous waste stituents in the ground water during the reporting lod?	***************************************	<u> X</u>	
	2)	was wat	the reports include the measured volumes of hazardous te or hazardous waste constituents removed from ground er using the abatement procedures specified in 265(n)(15)(vi)(C)?		\mathcal{H}/\mathcal{A}	·

Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection - Raymark Industries = Manheim, Pa. PAD 003015328

DATE:

FROM: OF Gregory A. Koltonuk, Environmental Scientist

RCRA Enforcement Section (3HW11)

TO:

File

Thru:

coment Section (3HW11)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY

REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS

REQUIRED AT THIS TIME.

HAZARDOUS WASTE INSPECTION REPORT TSD Facilities - Part A

Cf-5-84

te of inspection 6-19-84 Time start 10:30 Time finish 12:06
me of inspector Great Harder
mpany, installation name Raymon & Trylostvics
cation 1236 Strend St.
unty Lancaster Municipality Manheim
entification number 1AD003 015 328
me of responsible official (10.6) R Smith
=le President + Gen. manager, Ind. Div.
Jing address 100 Onliville Prive Trumball Ct 06611
203 - 371 - 0101
no of person interviewed (600) R. Houser
le Print Enginter
ling address (if different from above) 1236 Stiegel St. Dimbier ()
a code and phone no. 7/1/665-201/
Site Characterization:
g. 77 Trentment > 27 Am Fave Impoundments, 27 chemical, 27 physical, 23 biological
b. W Storago - W containors, // tanks, // surface impoundments, // waste piles
c. 💢 Disposal - 🖊 land treatment, 📈 landfill, 🗗 incineration, 🖊 thermal treat-
d. Z./ Use, Z./ roune, Z./ recycle, Z./ rectain ,
Dose the Lengtity delienate hemitighe mestes. 75/4 1 201211//
Types of hazardous waste produced by Hazardous Wast Numbell S 1984
10000 WATE
Are hawardous wastes transported off-site by the faultity? Z. Yes Z. Yes

	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	CHAPTER
HANCE TUS 3 4	REQUIREMENT RADMALLY	CHAPTER CITATION 75.265
	Part A pormit application submitted.	(a) (2), (z)
	Identification number.	(b)
X	Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b) (1)
<u>V</u>	Waste streams not covered by permit approved by the Department before accept	ince (c)(
	Chemical and physical analyses repeated as required.	(c)(1)
X	All waste shipments inspected and sampled.	(c) (2)
7. 77.	Waste analysis plan on site.	(c) (J)
	24 hr. survelllance at active portion.	(a) (2) (i
	Artificial barrier at active portion.	(d)(2)(i
1	Proper signs posted and legible at a distance of at least 25 ft.	(1) (3)
	Inspection schedule on site.	(e) (a)
	Maintenance adhedule on alte for equipment or atructures which reveal deterioration or maitunetion.	(e)(4)
.,	Immediate remedial action taken where a hazard is imminent or has already occurred.	(6) (4)
	On the job or classroom personnel training program,	(1)
	Records rotalized for each employee at facility of training, job title, and job description.	(f) (6), (
4	typilable or reactive wastes separated from source of lypition or reaction	(g) (1)
18.19 x 247	the amorting styre displayed where there are hazards from lynitable of reactly wastes.	(g) (1)
	Treatment, aforage, disposal of Lynitable or readilive wastes of mixing of two mpatible wastes or materials conducted according to requirements.	(ŋ) (ʔ)
	Pacifity equipped with internal alarm system capable of providing immediate omorgancy instruction to personnal.	(11) (2) (1
	Facility equipped with a device for summental butaids emergency againstance.	(h) (2) (i
	Facility equipped with fire control, spill control and decontamination equipment.	(h) (2) (1
	Facility equipped with water at adequate volume and pressure supply fire control equipment.	(h) (2) (i
	Pacifity communications or aform systems, fire control, spill control, and decontamination equipment tested and maintained.	(11) (3)
	હિનાએમાલિક વિનિધ વાલીએ ભાવતા વિદેશ દેશ મેરિયું લામેલીએકિમાંઇકાની માંઇ∀લેમાંના મેર્કોએલાઇકો સાલ હવુલા ⊵ાણભાદ હોલા 199 હાલા પ્રવાદ હ્યું	(H) (B)
	Contingency plan on-site and implemented.	(ic) (i)
	Contingency plan describes action taken by personnel in the	

		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
uan Tus	Œ	REQUIREMENT Rayman4 6-19-84	CHAPTER
3			75,265
		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
		Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i)(7)
		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i)(8)
		One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(ll)
\bigvee		Facility accepting only PA manifests - CIPtive	(j)
X		Manifests properly completed and routed within time limits (24 hrs.)	(j)(2)(3)
	,	Manifest discrepancies resolved or reported within time limits	(j) (10) (1
		Written operating record maintained on the premises	(k)
		Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k)(2)(i)
		Written operating record contains location and quantity of each hazardous wasto	(k) (2) (i i
		Written operating record contains results of waste analyses and treatability	(k) (2) (1)
*	, 41 14.	Written operating record contains reports and details of all incidents	(K) (2) (1)
pu		written operating record contains records and results of all inspections	(K) (4) (v)
		Writton operating record contains required monitoring, testing, and analytical data	(K) (2) (V)
`		Written operating record contains closure and post-closure cost estimates	(k) (2) (v)
)		All roomids relatingt on promines and available for impostion	(
		Quarterly reports admitted to the Department .	(m)
		Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(m) (2)
110		Choundwater monitoring wells located at approved sites	(11) (2)
اء بر	e d t Sant .	Adequate protection of groundwater monitoring weils	(11) (7)
_		Groundwater sampling and analysis plan on the premises	(n) (8)
٠		Groundwater quality assessment and abatement of the premises	(n) (14)
		Manual trun on the breminon and distribute Mill Mr. S. Ma	(11) (8) (1)
	Ň	Print: (Triature plant on the preminen and up-to-date biv. of two works with the preminent and the print of the preminent and the print of the pr	(u) (10) · (
		Annual closure cost out hade on the premises and up to date	(1) (2) (4
	,	Annual materials are sure of the contract of t	1

75.265

******		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
TAN TUS		REQUIREMENT Rayman4 6-14-84	CHAPTER CITATION
_	Ė	Containers managed to prevent leaks and spills	(q) (1), (·
		Containers are compatible with waste stored.	(q) (2)
-		Containers are closed during storage	(q) (3)
		Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
		Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
		Satisfactory procedures followed for handling incompatible wastes.	(d) ('/) , (t
_		Incompatible wastes separated or protected from other materials.	(q) (9)
ブ		Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 n 403(b)
		Precautions taken for tanks holding Ignitable, reactive, or incompatible waste or material	(r)(2)
		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(४) (4)
		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement	(r) (d)
		Continuously fed tanks equipped with a means to stop the inflow.	(p) (b)
		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	
1		Waste analyses and/or trial tests conducted on hazardous wastes substantiall different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	[¥] (r)(7)
		Discharge control equipment inspected once each openating day,	(r)(8)(i)
\int		Monitoring equipment data inspected once each operating day.	(r) (Ü) (L)
,	;y;z x er	biquid level of tanks impected once each operating day. Jul & 1984	(F) (U) (1)
		Construction materials of tanks inspected weekly. DN OF INVANDOS World	(1) (0) (1)
		Codeding for materials of algebrige conflictment of Matthewall and area income and area.	(+) (B) (A)
		All hazardous waste removed from tanks and related appurtenances at closure.	(4) (4)
		Placement of ignitable or reactive waste only with the Department's approval	(r)(10)
	7	mobild name journet kölük redajiellentek Gazaraq tanga ju mingap jahapipa ai redajiko munde ju finatod ai mparaq	1) (11)

TREATMEN STORAGE, DISPOSAL FACILITIES SANDFILLS

75.265

-			
		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
ATUS	VCE	REQUIREMENT RAYMALY 6.19-84	CHAPTER
		Run-on diverted away from the facility	(v) (2)
		Run-off collected from the active portions	(v) (3)
		Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste.	(v) (u)
		Facility is managed to prevent wind dispersal of hazardous waste.	(v) (5)
	X	The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record. The contents of each cell and the approximate location of each hazardous	(v) (6) (i
X		waste type within each cell kept in the operating record. Closure and post-closure requirements are complied with.	(v) (6) (i (v) (7) - (10)
X		Ignitable and reactive wastes disposed of with Department approval.	(v) (11)
1 χ		Precautions taken for the Alaponal of Incompatible wastes and materials	(4) (12)
	X	Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (13)
	X	Written approval from the Department to dispose of hazardous wastes containing less than 20% solids content by dry weight and are flowable	(v) (13)
		until November 16, 1981	
Ìχ	7314.	Hazardous waste co-disposed with municipal waste with Department approval	(v) (1d)
	5 ma. a	Emply containess crushed flat, shredded, or similarly reduced in volume bufore disposal	(v) (15)
		The second secon	i Na yakipakiniyasas
		1-00-07-07-07-08-08-08-08-08-08-08-08-08-08-08-08-08-	
		. 14.28.1 Mark Mark Mark Mark Mark Mark Mark Mark	Aller III
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		neu sieren 10 dan eir men diere til und des kant der ett und des kant der det geste 1824 bestellt.	and the finance of constitution in party

HAZARDOUS WASTE INSPECTION REPORT

e of inspection 6-14-34 Identification number PADOC3015 3.28
pany, Installation name Russmank Industries
nty Lancuster Municipality Marinein
Rumanie is planning on climanting down
storage and limiting accountation to day
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plans. Runner should submit to the
Significant Control of
DIV. OF HAZARDOUS WASTE
Miller Miller Market State Sta
Light to the three dear anythe The end he could be
15.24 (D) WWW (S) 2 - 2 Could U contico 3
Inspection report is official notification that a representative of the Department of commental Resources, Bureau of Solid Waste Management, Inspected the above installation.
- tugtuko at tipu tuahagetan ura upaki tii épiu taharer. Yilk Afaluttana Apigi kara migakékag
g the Inspection are indicated. Violations may also be discovered upon examination of equity of laboratory analyses and review of Department records. Notification will be coming coefficient and violations to the feet and listing any additional violations.
coming, confirming any violations indignifed herein and liming any additional violations. Interviewed (algunture)

AZARDOUS WASTE INSPECTION REPORTED

Fait C - Comments	
of inspection 6-14-34 Identification number PADOCSOIS 'S	</th
pany, Installation name Rayun-4 Industries	
ity Lancieste Municipality Mily heim	
Please submet within ten morting dus	
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promes which will proceed or main to	
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	Report # 45-701
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Manual resource for the first of the first o	
M JUL 2 1984	5-04 (Eni# 2
AND THE TAXABLE BEAUTIFUL AND ADDRESS OF THE PROPERTY OF THE P	erer i
Inspection report is official notification that a representative of the Department of onmental Resources, Bureau of Bolid Whate Management, Inspected the above installation indings of this inspection are shown in this report. Any violations which were uncovered the inspection are indicated. Yielations may also be discovered upon examination of sending of laboratory analyses and review of Department records. Notification will be coming, confirming any violations indicated herein and listing any additional violation in interviewed (signature)	t, erq

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts. Philadelphia, Pa. 19106

- Raybestos SUBJECT: RCRA Inspection - Raymark A

DATE: 5/14/84

FROM:

Gregory A. Koltonuk, Environmental Scientist RCRA Enforcement Section (3HW11)

TO:

File

Thru:

Peter W. Schaul, Chief RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

HAZARDOUS WASTE INSPECTION REPORT Generators - Part A

4-2-84

ate of inspection $3-26-84$ Time start 0.00 Time finish 0.30
ame of inspector Grea Harder
ompany, installation name Raymark Industries
ocation 123 E Stirry 5t.
ounty Lascaste Municipality Manheim
lentification number PAD 003 015 328
ame of responsible official Chaig R Smith
Die M. President Gen. Manager, Industrial Div.
illing address 100 Oakville Prive Trumball CT 06611
tea code and phone no. 203-371-0/01
ame of person interviewed C-to-je R Houser
tle Project Engineer
illing address (if different from above) 123 E Stitat St. Manhton PA
rea code and phone no. 717-665- 2211 1754
Current waste handling method:
a. Con-site Contract treatment, Storage, disposal
b. Ø On-site wse, reuse, recycle, reclaim
c. Ø Off-site / treatment, / storage, Ø disposal
d. A Off-site use, reuse, recycle, reclaim
Amount of hazardous waste produced:
·a. 40,000 16/et- kgs/110.
bkg./yr.
Types of hazardous waste produced by Hazardous Waste Number:
DOUL FUES DUUS

Are hazardous wastes transported off-site by the generator?

Yes No

No

No

PROVENT

`		1- NON-COMPLIANCE, Z- COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
JAN US	ICE 4	REQUIREMENT RASMA-4	CHAPTEI CITÁTIC 75.262
		Identification number •	(c)(l)
-		Hazardous waste shipments offered only to licensed transporters	(¢)(4)
		Authorization received from TSD facility for wastes shipped off-site	(d)
		PA manifest used for intrastate shipments	(e)(l)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(1)(
		Manifests filled out properly and completely	(e)(l)
	·	Manifests routed properly and within time limits (24 hours)	(e)(2)
)		Proper U.S. DOT shipping containers or packages	(f)(l)
		Shipping containers marked and labeled according to U.S. DOT	(f)(l)(
		Containers of 110 gal. or less marked with required PA label	(f)(l)(
_	X	Placards offered to transporter	(f)(2)
7		Wastes accumulated on-site for less than 90 days 15 750	(g)(l)
-		Wastes stored in proper containers and properly marked and labeled	(g)(l)
		Containers managed in accordance with 75.265(g)	(g)(l)
		Containers clearly marked with accumulation date and visible for inspection	(g)(1)
7	X	Records retained at designated location for 20 years.	(h)
_		Quarterly reports submitted to the Department	(±))/\
_		Exception reporting procedures followed	ٔ (رُوِّ ⁾)
7		Hazardous waste disposal plan, if required	(1)
		spill reporting procedures followed - 10 Sp. 11s tpu-attitude	(m) (l)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
7.		Special requirements followed for international shipments	(<u>o</u>)
C			
•		•	
•			
	1		·

HALARDOUS WASTE INSPECTION REPORT TSD Facilities - Part A

Cl_{A3} 84

of inspection 3-26-84 Time start 10:30 Time finish 1:00
of inspector G-40 Houler
ny, installation name Rayman4 fullstriks
ion 123 E Stiepel St.
y Lancuster Municipality Markein
ification number PADOUS 015 328
of responsible official Craig R 5 mith
All President + Gen. Manager, Industrial Div.
ag address 100 Oukville Drive Trumball CT olabli
code and phone no. $203-371-0101$
of person interviewed (-1016- R Houser
Project Engineer
ig address (if different from above) 123 £ Sticor/ St. Manheim PA
ode and phone no. 117-665-2211 17545
te characterization:
Treatment - T surface impoundments, T chemical, T physical, T biological
Storage - containers, tanks, surface impoundments, waste piles
Disposal - land treatment, landfill, incineration, thermal treat-
□ Use, □ reuse, □ recycle, □ reclaim
es the facility generate hazardous wastes? X Yes \(\sigma \) No
es of hazardous waste produced by Hazardous Waste Number: DUUI FUCS DUUS
hazardous wastes transported off-site by the facility? Yes X No

TREATMENT, STORAGE, PESPOSAL FACILITIES STORAGE (Containers and Tanks)

75.265.

10100	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	C142-5
1NCE US 3 4	REQUIREMENT 4 Momany	CHAPTER
	Containers managed to prevent leaks and spills	(q)(l),
	Containers are compatible with waste stored.	(q)(2)
	Containers are closed during storage	(q) (3)
	Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
<i>f</i> -	Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
	Satisfactory procedures followed for handling incompatible wastes.	(q)(7),
	Incompatible wastes separated or protected from other materials.	(q) (9)
7	Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 n 403(b)
	Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r)(2)
	Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
	Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
	Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement	(r)(4)
	Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)
	Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	
$\left\{ \left[-\right] \right\} $	Waste analyses and/or trial tests conducted on hazardous wastes substantial different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r)(7)
	Discharge control equipment inspected once each operating day.	(r) (8) (:
\prod	Monitoring equipment data inspected once each operating day	(r) (8) (:
	Liquid level of tanks inspected once each operating day	(x) (8) (
\prod	Construction materials of tanks inspected weekly.	(r) (8) (
	Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8) (v
\prod	All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
\prod	Placement of ignitable or reactive waste only with the Department's approval	(r)(10)
	Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(r) (11)

TREATMEN, STORAGE, DISPOSAL FACILITIES CLANDFILLS

75.265

			1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
ATZ	TUS		REQUIREMENT RASMALY	CHAPTER CITATION
12	3	4		
X			Run-on diverted away from the facility	(v) (2)
	•	X	Run-off collected from the active portions (SG- (omin 6)	(v) (3)
		X	Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste.	(v) (3)
X			Facility is managed to prevent wind dispersal of hazardous waste.	(v) (5)
		X	The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record. The contents of each cell and the approximate location of each hazardous waste type within each cell kept in the operating record.	(v) (6) (i
	X		Closure and post-closure requirements are complied with.	(v)(7) - (10)
)	X.		Ignitable and reactive wastes disposed of with Department approval.	(v) (11)
	X		Precautions taken for the disposal of incompatible wastes and materials	(v) (12)
			Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (13)
		X	Written approval from the Department to dispose of hazardous wastes containing less than 20° solids content by dry weight and are flowable until November 18, 1981	(v) (13)
-	1			
	ĮX,		Hazardous waste co-disposed with municipal waste with Department approval	(v) (14)
	X		Empty containers crushed flat, shredded, or similarly reduced in volume before disposal	(v) (15)
)				
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			Miles of the second sec	
			Luman	
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HAZARDOUS WASTE INSPECTION RELOT Part C - Comments

e of inspection 3-26-87 Identification number PAD 003018 320
pany, Installation name Raymank Industries
nty Lancaster Municipality Manheim
One container labeled mch (DOOI)
in the drum storing area overflowed and was
Spilling onto the ground even though it appeared
to have a lide spill residue should be collected
and contents transferred to a container in
good condition within one morteing day.
75,265 (4) (1,5)
a purpot approximately 45 chums inter
storage area were without labels or
Accumulation dates in violation of 75.262
(f) (1) (iii), 75.262 (g) (1) (iv), and 75.262 (g) (2) (iii).
All containes should be properly manhed and
Institut within one week.
Rain natur has accompleted intro
Hw landfill area in two pends" of Inis is
in violation of the Lundtill Release Regulations
75.24 () (1) (XVIII) which 4-40. 200 that
Surface nate- percolation into the solutionste
be petrested on minimized. It is begonniended
inspection report is official notification that a representative of the Department of ronmental Resources, Bureau of Solid Waste Management, inspected the above installation.
findings of this inspection are shown in this report. Any violations which were uncovered
ng the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be
acoming, confirming any violations indicated herein and listing any additional violations.
on Interviewed (signature) Date
ctor (signature) Date

HAZARDOUS WASTE INSPECTION RE RT Part C - Comments

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nmentandings the issults	l Resou s of thi inspecti of labo	irces, B is inspe ion are oratory	ureau oi ction ai indicate analyses	Solid e show d V	d Waste wn in th lolation review o	Managem is repo s may a f Depar	ent, in rt. An lso be tment re	spected y viola discove ecords.	the ab tions w red upo Notif	ove in hich w n exam icatio	rtment o stallati ere unco ination n will b l violat	on. ver of e

Hazardous Waste Monitoring And Enforcement Log

2. FACILIT	- EPA ID: 1818/1010131011151312181 - FACILITY NAME: Roymark Industries - ADDRESS: 123E Stiegel St. Manheim PA 17545 - Manheim PA 17545								
5. TYPE OF	REPORT:	NEW [UPDATE	-					
ł	S. DATES OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: M D Y								
	EVALUATION COVERED REPORT:		ATION IN ING INSP	SPECTION ECTION	☐ RECO		/IEW ISPECTION	Respon	sible Francy 5
- BY THIS	EVALUATION COVERED REPORT (enter only erent from 5):	START / M D	/					-	5
1 -	D CLASS OF VIOLATION	Class of			Area of Vio	lation			nifest
E .	number of violations and class):	Violation	GWM	C1/PC	Fin. Res.	Pt. B	Comp. S	ched.	Other
by cype	and Classy.	I				•			
		i i i i i i i i i i i i i i i i i i i							
) III							2
10.ENFORCE	MENT ACTIONS for Class I Violatio	ons:	**						
		3	-	Projected	Actual		7014	y (\$000)	
incea of Violation	Type of Action Taken (circle one)	3	te Action ken (mdy)	Compliance Date (mdy)	Compliance Date (mdy)	,	Assessed		llected
other	Thformal WL/NÖV AO Civac	CrimAc 3	126/84	4/2/84	/ /			<u>-</u>	<u>.</u>
	Informal WL/NOV AO CivAc		/_/_		_/_/_				
Informal WL/NOV AO CivAc		CrimAc	/ /	/ /			-		
;	Informal WL/NOV AO CivAc	Cr1mAc	/_/_	_/_/_					
11.COMMENIS	: 2 violations r	outed re	Intim i	to leahi	no contain	nt- 0	and un	labe	led
	11. COMMENTS: 2 violations noted relating to leaking container and unlabeled								

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MAY 10 1984

JNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts. Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection-Raymark Adustics - Marchem, Pa.

Gregory Koltonuk (7)
Environmental Scientist (3AW22)
File

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

HAZARDOUS WASTE INSPECTION REPORT Generators - Part A

\2	2-26	q.533	12.	
	Time	finish	10!	3.0

ate of inspection $12-20-83$ Time start $10:00$ Time finish $10:30$
ame of inspector Grey Harder for miller
ompany, installation name Rayman to Justices
ocation 123 E Stiegel St.
ounty Lancuster Municipality Manheim
dentification number PAD 003-015 328
ame of responsible official Cray R Smith
tle Prident 1 Gan. Manager, Industrial Mir,
ailing address 100 Onkulle Prive Trumbull CT Oblil
rea code and phone no. 203 - 37/-0/0/
ame of person interviewed 6-60-56-8 Housen
itle Project Engineer
ailing address (if different from above) 123 & Strengt St, Manherm HA
rea code and phone no. 7/7-(665-221) 17545
. Current waste handling method:
) a. \(\times \) On-site \(\times \) treatment, \(\times \) storage, \(\times \) disposal \(\times \) \(\times \) 28 1983
b. On-site wse, reuse, recycle, reclaim
c. All Off-site treatment, storage, disposal
d. A Off-site use, A reuse, recycle, reclaim
Amount of hazardous waste produced:
· a40,000 16/1/1/ *g-/ma.
b kg./yr.
Types of hazardous waste produced by Hazardous Waste Number: [DOO] FGG FOOS 1008
Are hazardous wastes transported off-site by the generator? The Yes A No
pool Howen - American

٠. ٠	w.y	1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
LIAN	KE		CHAPTER
TUS	4	REQUIREMENT RUSINGEL 13-20-83	75.262
		Identification number	(c)(l)
		Hazardous waste shipments offered only to licensed transporters	(¢)(4)
		Authorization received from TSD facility for wastes shipped off-site	(d)
		PA manifest used for intrastate shipments	(e)(l)(i)
		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(l)(iii
		Manifests filled out properly and completely	(e)(l)
		Manifests routed properly and within time limits (24 hours)	(e)(2)
)		Proper U.S. DOT shipping containers or packages	(f)(1)(i)
		Shipping containers marked and labeled according to U.S. DOT	(f)(l)(ii)
		Containers of 110 gal. or less marked with required PA label	(f) (l) (iii
-	X	Placards offered to transporter	(f)(2)
Z		Wastes accumulated on-site for less than 90 days 15750	(g)(l)
-		Wastes stored in proper containers and properly marked and labeled	(g)(l)(ii
		Containers managed in accordance with 75.265(g)	(g)(l)(ii
		Containers clearly marked with accumulation date and visible for inspection	(g)(l)(iv
)	X	Records retained at designated location for 20 years	(h)
		Quarterly reports submitted to the Department	(i)
		Exception reporting procedures followed 170 EVERTIONS we ported	(j)
1		Hazardous waste disposal plan, if required	(1)
		spill reporting procedures followed no spills whoo tell	(m) (l)
		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
$\sqrt{}$		Special requirements followed for international shipments	(0)
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HAZARDOUS WASTE INSPECTION REPORT TSD Facilities - Part A

of inspector Grey Harder, form miller any, installation name Raymand Industries tion 123 E Stient SE. ty Lancaster Municipality Marketm tification number PAD 003 015 328 of responsible official Erain R Smith e President and General Manager Industrial Divining address 100 Oakville Dive Trumbull (T obtall code and phone no. 203 - 371 - 0101 of person interviewed Grove R Houser
any, installation name RABMANG FORMANDERS tion 123 E SCIENCE SE ty CANCESTER Municipality MANDEIM tification number PAID 003 015 328 of responsible official Erain R Smith e President and General Manager; Industrial Pivoling address 100 Oakville Prive Trumbull (T 06611) code and phone no. 203 - 371 - 0101
tification number PAID 003 015 328 of responsible official Real Resmith e President and General Manager, Industrial Pive ing address 100 Oakville Prive Trumbull (T 06611) code and phone no. 203 - 371 - 0101
tification number PAID 003 015 328 of responsible official Real Resmith e President and General Manager, Industrial Pive ing address 100 Oakville Prive Trumbull (T 06611) code and phone no. 203 - 371 - 0101
of responsible official Krain R Smith e President and General Manager, Industrial Pivaling address 100 Oakville Prive Trumbull (T 06611) code and phone no. 203 - 371 - 0/01
ing address 100 Oakville Dive Trumbull (T 0661) code and phone no. 203 - 371 - 0/01
ing address 100 Oakville Dive Trumbull (T 0661) code and phone no. 203 - 371 - 0/01
code and phone no. 203 - 371 - 0/0/
of norson interviewed Coffee R: House
2 Project Engineer
ing address (if different from above) 123 E Stitor St. Manheim
code and phone no. 7/7-1665-2211 PA 17545
Site characterization:
Treatment surface impoundments, _ chemical, _ physical, _ biological
. A Storage - Containers, C tanks, C surface impoundments, C waste piles
. Disposal - Dand treatment, Dandfill, Dincineration, Dandthermal treatment
. Use, reuse, recycle, reclaim
pes the facility generate hazardous wastes? Yes No
pes of hazardous waste produced by Hazardous Waste Number:
e hazardous wastes transported off-site by the facility?
1001 F005 12008 1

TREATMENT, STORAGE, DISPOSAL FACILITIES - STORAGE Ontainers and Tanks)

75.265

······		 1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
COMP STA	TUS	REQUIREMENT PASMILLY 12.30.83	CIMPTER
X		Containers managed to prevent leaks and spills	(q)(l),(
P		Containers are compatible with waste stored.	(q)(2)
1		Containers are closed during storage	(q) (3)
1		Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
	1	Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
V		Satisfactory procedures followed for handling incompatible wastes.	(q)(7),(·
	1	Incompatible wastes separated or protected from other materials.	(q)(9)
X	1	CO., Ca. 1	Λct 97 n 403(b)
1	1	Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r)(2)
		Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement	(r)(4)
		Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)
		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	
		Waste analyses and/or trial tests conducted on hazardous wastes substantiall different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	¥x) (7)
		Discharge control equipment inspected once each operating day.	(r)(8)(i
		Monitoring equipment data inspected once each operating day.	(r)(8)(i
		Liquid level of tanks inspected once each operating day.	(r)(8)(i
	1	Construction materials of tanks inspected weekly.	(r)(8)(i
		Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r)(8)(v
		All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
		Placement of ignitable or reactive waste only with the Department's approval	(r)(10)
-		Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r)(]])
	4	Precautions taken for handling ignitable, reactive or incompatible waste	(r)(12),

Section Section		/5.265	
		1- NON-COMPLIANCE, Z-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED	
STATUS	<u>.</u>	REQUIREMENT RUSMULY 12-20-83	CHAPTER
X		Run-on diverted away from the facility	(v) (2)
TY I		Run-off collected from the active portions	(v) (3)
X		Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste.	(v) (3)
IX		Facility is managed to prevent wind dispersal of hazardous waste.	(v) (5)
	X	The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on a map in the operating record. The contents of each cell and the approximate location of each hazardous	(v)(6)(i)
44	X	waste type within each cell kept in the operating record.	(v) (6) (ii)
	X	Closure and post-closure requirements are complied with.	(v)(7) - (10)
1 1		Ignitable and reactive wastes disposed of with Department approval.	(v)(ll)
1 1		Precautions taken for the disposal of incompatible wastes and materials	(v) (12)
X		Hazardous wastes disposed contains greater than 20% solids content by dry weight and are non-flowable and do not contain free liquid.	(v) (l3)
TX		Written approval from the Department to dispose of hazardous wastes containing less than 20% solids content by dry weight and are flowable	(v) (13)
	-	until November 18, 1981	
TX		Hazardous waste co-disposed with municipal waste with Department approval	(v) (14)
		Empty containers crushed flat, shredded, or similarly reduced in volume before disposal	(v) (15)
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HAZARDOUS WASTE INSPECTION	REP()
Part C - Comments	

Part C - Comments
of inspection 12-20-83 Identification number PADOO3 015-3-22
any, Installation name Rasmark
ty LANG. Municipality Manhaim
Du the increation account water
Jorna Cita Hagerica growing with
During this inspection ground unter- nonitoring wells were inspected for onstruction, depty, static unter level, etc.
onstruction, depty, static water level, etc.
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inspection report is official notification that a representative of the Department of ronmental Resources, Bureau of Solid Waste Management, inspected the above installation. findings of this inspection are shown in this report. Any violations which were uncovered ng the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be hooming, confirming any violations indicated herein and listing any additional violations.
on Interviewed (signature) / Slowell Sould Date 12/20/83
ector (signature) 32 Aug 9 Date 12-20-83